

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Reclaimed Energy Company, Inc.  
1500 Western Avenue  
Connersville, Indiana 47331**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 041-6719-00015	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management <i>Original signed by Janet McCabe</i>	Issuance Date: June 1, 2001  Expiration Date: June 1, 2006

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**Emergency Occurrence Report**

**Natural Gas-Fired Boiler Certification**

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary chemical recycling source.

Responsible Official: Tony Mode  
Source Address: 1500 Western Avenue, Connersville, Indiana 47331  
Mailing Address: 1500 Western Avenue, Connersville, Indiana 47331  
SIC Code: 7389, 7398, 7399, & 2869  
County Location: Fayette  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) vacuum distillation unit, known as EU-VD 1, rated at 1.7 million British thermal units per hour, consisting one (1) vacuum pot, one (1) vacuum column, and one(1) vacuum condenser, equipped with a 600 gallon distillate receiver, known as EU-TK 22, equipped with a catalytic thermal oxidizer, installed in 1997, exhausted through Stacks VD 1 and FI 1, capacity: 9,600 gallons per 24 hours, holding capacity: 3,300 gallons of solvent.
- (b) One (1) product storage tank, known as EU-TK 23, installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (c) One (1) product storage tank, known as EU-TK 24, installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (d) One (1) product storage tank, known as EU-TK 25, installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (e) One (1) natural gas-fired fire tube boiler, known as EU-BO 1, installed in 1981, exhausted through Stack S 1, rated at 25.11 million British thermal units per hour.
- (f) One (1) fractionation column No.1, known as EU-Col 1, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK18, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1983, exhausted through Stacks CV 1 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (g) One (1) fractionation column No.2, known as EU-Col 2, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK19, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1984, exhausted through Stacks CV 2 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.

- (h) One (1) vacuum pump, known as EU-VP 1, rated at 275 cubic feet per minute peak, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks VP 1 and FI 1, installed in 1994.GF35
- (i) One (1) pot still1, known as EU-DP 1, attached to 275 gallon distillate receiver, known as EU-TK20, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stack DP 1 and FI 1, installed in 1992, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (j) One (1) thin film evaporator No.1, known as EU-TF 1, equipped with a 450 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 1 and FI 1, installed in 1984, throughput capacity: 14,400 gallons of solvent per twenty-four (24) hour period.
- (k) One (1) thin film evaporator No.2, known as EU-TF 2, equipped with a 350 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 2 and FI 1, installed in 1990, throughput capacity: 14,400 gallons of solvent per 24 hours.
- (l) One (1) mixed solvent (molecular sieve) dryer, known as EU-MS 1, installed in 1995, exhausted through Stack MS1, capacity: 6,500 gallons per batch, one (1) batch per 13.5 hours.
- (m) One (1) natural gas-fired fume incinerator (catalytic thermal oxidizer), known as FI 1, rated at 1.5 million British thermal units per hour, installed December 1997, exhausted through Stack FI 1, exhaust rate: 2,500 cubic feet per minute.
- (n) One (1) product storage tank, known as EU-TK 1, installed in 1990, capacity: 6,500 gallons of volatile organic compounds.
- (o) One (1) product storage tank, known as EU-TK 2, installed in 1981, capacity: 6,800 gallons of volatile organic compounds.
- (p) One (1) product storage tank, known as EU-TK 3, installed in 1983, capacity: 6,000 gallons of volatile organic compounds.
- (q) One (1) product storage tank, known as EU-TK 4, installed in 1983, capacity: 4,500 gallons of volatile organic compounds.
- (r) One (1) product storage tank, known as EU-TK 5, installed in 1985, capacity: 2,150 gallons of volatile organic compounds.
- (s) One (1) product storage tank, known as EU-TK 6, installed in 1985, capacity: 1,000 gallons of volatile organic compounds.
- (t) One (1) product storage tank, known as EU-TK 7, installed in 1985, capacity: 1,550 gallons of volatile organic compounds.
- (u) One (1) product storage tank, known as EU-TK 8, installed in 1985, capacity: 1,550 gallons of volatile organic compounds.

- (v) One (1) product storage tank, known as EU-TK 9, installed in 1990, capacity: 1,800 gallons of volatile organic compounds.
- (w) One (1) product storage tank, known as EU-TK 10, installed in 1990, capacity: 6,500 gallons of volatile organic compounds.
- (x) One (1) product storage tank, known as EU-TK 11, installed in 1990, capacity: 3,000 gallons of volatile organic compounds.
- (y) One (1) product storage tank, known as EU-TK 12, installed in 1990, capacity: 6,500 gallons of volatile organic compounds.
- (z) One (1) product storage tank, known as EU-TK 13, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (aa) One (1) product storage tank, known as EU-TK 14, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (bb) One (1) product storage tank, known as EU-TK 15, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (cc) One (1) product storage tank, known as EU-TK 16, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (dd) One (1) product storage tank, known as EU-TK 17, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (ee) One (1) product storage tank, known as EU-TK 30, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (ff) One (1) product storage tank, known as EU-TK 31, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (gg) One (1) product storage tank, known as EU-TK 32, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (hh) One (1) product storage tank, known as EU-TK 33, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (ii) One (1) product storage tank, known as EU-TK 34, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (jj) One (1) product storage tank, known as EU-TK 35, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (kk) One (1) product storage tank, known as EU-TK 36, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (ll) One (1) product storage tank, known as EU-TK 37, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (mm) One (1) product storage tank, known as EU-TK 38, installed in 1983, capacity: 10,000 gallons of spent volatile organic compound waste.

- (nn) One (1) product storage tank, known as EU-TK 39, installed in 1983, vented to a catalytic thermal oxidizer, capacity: 12,000 gallons of spent volatile organic compound waste and still bottoms.
- (oo) One (1) product storage tank, known as EU-TK 40, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (pp) One (1) product storage tank, known as EU-TK 41, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (qq) One (1) product storage tank, known as EU-TK 42, installed in 1984, capacity: 5,100 gallons of process water.
- (rr) One (1) product storage tank, known as EU-TK 50, installed in 1992, capacity: 6,900 gallons of waste volatile organic compounds.
- (ss) One (1) product storage tank, known as EU-TK 51, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,800 gallons of volatile organic compounds and distillation heels.
- (tt) One (1) product storage tank, known as EU-TK 52, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (uu) One (1) product storage tank, known as EU-TK 53, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (vv) One (1) over pressurization temporary accumulation vessel, known as EU-V 61, attached to the catalytic thermal oxidizer, installed in 1997, capacity: 165 gallons.
- (ww) Small pilot solvent recycling unit, known as EU-SP, catalytic thermal oxidizer, with batch capacity: 165 gallons.
- (xx) One (1) solid dispersion unit, known as EU-SD 1, consisting of one (1) 250 gallon tub and one (1) dispenser, exhausted through Stacks SD 1 and FI 1, vented to a catalytic thermal oxidizer, throughput capacity: 19,200 gallons per day.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]  
This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-7-6(1)]**

##### **C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

- (a) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) The Permittee may request the IDEM, OAM approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
within ninety (90) days after the date of issuance of this permit.  
  
The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.

- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

- (1) Indicate estimated actual emissions of criteria pollutants from the source;
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

**C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) vacuum distillation unit, known as EU-VD 1, rated at 1.7 million British thermal units per hour, consisting one (1) vacuum pot, one (1) vacuum column, and one(1) vacuum condenser, equipped with a 600 gallon distillate receiver, known as EU-TK 22, equipped with a catalytic thermal oxidizer, installed in 1997, exhausted through Stacks VD 1 and FI 1, capacity: 9,600 gallons per 24 hours, holding capacity: 3,300 gallons of solvent.
- (f) One (1) fractionation column No.1, known as EU-Col 1, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK18, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1983, exhausted through Stacks CV 1 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (g) One (1) fractionation column No.2, known as EU-Col 2, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK19, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1984, exhausted through Stacks CV 2 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (h) One (1) vacuum pump, known as EU-VP 1, rated at 275 cubic feet per minute peak, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks VP 1 and FI 1, installed in 1994.
- (i) One (1) pot still1, known as EU-DP 1, attached to 275 gallon distillate receiver, known as EU-TK20, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stack DP 1 and FI 1, installed in 1992, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (j) One (1) thin film evaporator No.1, known as EU-TF 1, equipped with a 450 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 1 and FI 1, installed in 1984, throughput capacity: 14,400 gallons of solvent per twenty-four (24) hour period.
- (k) One (1) thin film evaporator No.2, known as EU-TF 2, equipped with a 350 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 2 and FI 1, installed in 1990, throughput capacity: 14,400 gallons of solvent per 24 hours.
- (l) One (1) mixed solvent (molecular sieve) dryer, known as EU-MS 1, installed in 1995, exhausted through Stack MS1, capacity: 6,500 gallons per batch, one (1) batch per13.5 hours.
- (m) One (1) natural gas-fired fume incinerator (catalytic thermal oxidizer), known as FI 1, rated at 1.5 million British thermal units per hour, installed December 1997, exhausted through Stack FI 1, exhaust rate: 2,500 cubic feet per minute.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 NESHAP [326 IAC 20-23-1] [40 CFR Part 63]

EU-VD 1, EU-Col 1, EU-Col 2, EU-VP1, EU-DP 1, EU-TF 1, EU-TF 2 and EU-FI 1 are subject to 40 CFR Part 63 as specified in Section D.6.

**D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6 (New facilities; general reduction requirements):

- (a) the as-installed catalytic thermal oxidizer is the Best Available Control Technology and shall be operated at all times when any of the following are in operation:
  - (1) the vacuum distillation unit (EU-VD 1),
  - (2) the fractionation columns (EU-Col 1 or EU-Col 2),
  - (3) the vacuum pump (EU-VP 1),
  - (4) the pot still 1 (EU-DP 1), or
  - (5) the thin film evaporators No. 1 or 2 (EU-TF 1 or EU-TF-2).
- (b) the volatile organic compound (VOC) emissions shall not exceed 58.9 tons per twelve (12) consecutive month period for all facilities equipped with the catalytic thermal oxidizer and other recycling/processing operations to be calculated by the following equation:

$$\text{VOC emissions} = \text{Input VOC} * (1 - \text{overall control efficiency of the thermal oxidizer}) + 3(\text{uncontrolled VOC input} * \text{emission factor}).$$

**D.1.3 Volatile Organic Compounds (VOC) and HAPs [Resources Conservation Recovery Act (RCRA) Subpart AA, 40 CFR 264]**

Pursuant to CP 041-9017-00015 issued on November 6, 1997, the one (1) vacuum distillation unit, known as EU-VD 1, consisting one (1) vacuum pot, one (1) vacuum column, and one(1) vacuum condenser, equipped with a 600 gallon distillate receiver, known as EU-TK 22, equipped with a catalytic thermal oxidizer, installed in 1997, exhausted through Stacks VD 1 and FI 1, shall comply with the requirements of Resources Conservation Recovery Act (RCRA), Subpart AA, 40 CFR 264.

**D.1.4 Catalytic Thermal Oxidizer Operation**

- (a) The catalytic thermal oxidizer shall operate at all times that any of the facilities listed in Condition D.1.2 are operated. When operating, the catalytic thermal oxidizer shall maintain a minimum operating temperature of 650E Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum 90 percent destruction of the volatile organic compound (VOC) captured.
- (b) When operating the thermal oxidizer, the thermal oxidizer shall maintain a minimum ninety-five (95) percent capture efficiency and ninety-five (95) percent destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by rule 326 IAC 8-1-2(a)(2).

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.6 Monitoring**

- (a) Daily records of the catalytic thermal oxidizer exhaust temperature shall be observed on each day that any of the facilities listed in Condition D.1.2 operated. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.2(b), the Permittee shall maintain records at the facility of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limit pursuant to 326 IAC 8-1-6.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the daily exhaust temperature or indicate that none of the facilities listed in Condition D.1.2 were in operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### **Facility Description [326 IAC 2-7-5(15)]**

- (e) One (1) natural gas-fired fire tube boiler, known as EU-BO 1, installed in 1981, exhausted through Stack S 1, rated at 25.11 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3 (e)]

Pursuant to 326 IAC 6-2-3 (e) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the boiler, EU-BO 1, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]**

- (b) One (1) product storage tank, known as EU-TK 23, installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (c) One (1) product storage tank, known as EU-TK 24, installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (d) One (1) product storage tank, known as EU-TK 25, installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (n) One (1) product storage tank, known as EU-TK 1, installed in 1990, capacity: 6,500 gallons of volatile organic compounds.
- (o) One (1) product storage tank, known as EU-TK 2, installed in 1981, capacity: 6,800 gallons of volatile organic compounds.
- (p) One (1) product storage tank, known as EU-TK 3, installed in 1983, capacity: 6,000 gallons of volatile organic compounds.
- (q) One (1) product storage tank, known as EU-TK 4, installed in 1983, capacity: 4,500 gallons of volatile organic compounds.
- (r) One (1) product storage tank, known as EU-TK 5, installed in 1985, capacity: 2,150 gallons of volatile organic compounds.
- (s) One (1) product storage tank, known as EU-TK 6, installed in 1985, capacity: 1,000 gallons of volatile organic compounds.
- (t) One (1) product storage tank, known as EU-TK 7, installed in 1985, capacity: 1,550 gallons of volatile organic compounds.
- (u) One (1) product storage tank, known as EU-TK 8, installed in 1985, capacity: 1,550 gallons of volatile organic compounds.
- (v) One (1) product storage tank, known as EU-TK 9, installed in 1990, capacity: 1,800 gallons of volatile organic compounds.
- (w) One (1) product storage tank, known as EU-TK 10, installed in 1990, capacity: 6,500 gallons of volatile organic compounds.
- (x) One (1) product storage tank, known as EU-TK 11, installed in 1990, capacity: 3,000 gallons of volatile organic compounds.
- (y) One (1) product storage tank, known as EU-TK 12, installed in 1990, capacity: 6,500 gallons of volatile organic compounds.
- (z) One (1) product storage tank, known as EU-TK 13, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (aa) One (1) product storage tank, known as EU-TK 14, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (bb) One (1) product storage tank, known as EU-TK 15, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (cc) One (1) product storage tank, known as EU-TK 16, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.

**Facility Description [326 IAC 2-7-5(15)] continued**

- (dd) One (1) product storage tank, known as EU-TK 17, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (ee) One (1) product storage tank, known as EU-TK 30, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (ff) One (1) product storage tank, known as EU-TK 31, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (gg) One (1) product storage tank, known as EU-TK 32, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (hh) One (1) product storage tank, known as EU-TK 33, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (ii) One (1) product storage tank, known as EU-TK 34, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (jj) One (1) product storage tank, known as EU-TK 35, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (kk) One (1) product storage tank, known as EU-TK 36, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (ll) One (1) product storage tank, known as EU-TK 37, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (mm) One (1) product storage tank, known as EU-TK 38, installed in 1983, capacity: 10,000 gallons of spent volatile organic compound waste.
- (nn) One (1) product storage tank, known as EU-TK 39, installed in 1983, vented to a catalytic thermal oxidizer, capacity: 12,000 gallons of spent volatile organic compound waste and still bottoms.
- (oo) One (1) product storage tank, known as EU-TK 40, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (pp) One (1) product storage tank, known as EU-TK 41, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (qq) One (1) product storage tank, known as EU-TK 42, installed in 1984, capacity: 5,100 gallons of process water.
- (rr) One (1) product storage tank, known as EU-TK 50, installed in 1992, capacity: 6,900 gallons of waste volatile organic compounds.
- (ss) One (1) product storage tank, known as EU-TK 51, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,800 gallons of volatile organic compounds and distillation heels.
- (tt) One (1) product storage tank, known as EU-TK 52, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (uu) One (1) product storage tank, known as EU-TK 53, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (vv) One (1) over pressurization temporary accumulation vessel, known as EU-V 61, attached to the catalytic thermal oxidizer, installed in 1997, capacity: 165 gallons.

**Facility Description [326 IAC 2-7-5(15)] continued**

- (ww) Small pilot solvent recycling unit, known as EU-SP, catalytic thermal oxidizer, with batch capacity: 165 gallons.
- (xx) One (1) solid dispersion unit, known as EU-SD 1, consisting of one (1) 250 gallon tub and one (1) dispenser, exhausted through Stacks SD 1 and FI 1, vented to a catalytic thermal oxidizer, throughput capacity: 19,200 gallons per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.3.1 NESHAP [326 IAC 20-23-1] [40 CFR Part 63]**

EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 41, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, EU-TK 53, EU-V 61 and EU-SD 1 are subject to 40 CFR Part 63 as specified in Section D.6.

**D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6 (New facilities; general reduction requirements):

- (a) the as-installed catalytic thermal oxidizer is the Best Available Control Technology and shall be operated at all times when EU-TK39, EU-TK40, EU-TK41, EU-TK51, EU-TK52, EU-TK53, EU-V61 and EU-SP are being utilizing in the recycling process:
- (b) the volatile organic compound (VOC) emissions shall not exceed 58.9 tons per twelve (12) consecutive month period for all facilities equipped with the catalytic thermal oxidizer.

VOC emissions = Input VOC \*(1- overall control efficiency of the thermal oxidizer) + 3(uncontrolled VOC input \* emission factor).

**D.3.3 Catalytic Thermal Oxidizer Operation**

- (a) The catalytic thermal oxidizer shall operate at all times that any of the facilities listed in Condition D.3.2 are being utilized. When utilized, the catalytic thermal oxidizer shall maintain a minimum operating temperature of 650E Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum 90 percent destruction of the volatile organic compound (VOC) captured.
- (b) When operating the thermal oxidizer, the thermal oxidizer shall maintain a minimum ninety-five (95) percent capture efficiency and ninety-five (95) percent destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by rule 326 IAC 8-1-2(a)(2).

**D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.3.5 Monitoring**

- (a) Daily records of the catalytic thermal oxidizer exhaust temperature shall be observed on each day that any of the facilities listed in Condition D.3.2 operated. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.3.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.2(b), the Permittee shall maintain records at the facility of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limit pursuant to 326 IAC 8-1-6.
- (b) To document compliance with Condition D.3.3, the Permittee shall maintain records of the daily exhaust temperature or indicate that none of the facilities listed in Condition D.3.2 (b) were in operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.4

## FACILITY CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Insignificant Activity

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### Construction Conditions [326 IAC 2-1-3.2]

#### General Construction Conditions

- D.4.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### Effective Date of the Permit

- D.4.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.4.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.
- D.4.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

#### First Time Operation Permit

- D.4.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration & Development Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

### **Operation Conditions**

#### **Emission Limitations and Standards [326 I 2-7-5(1)]**

##### **D.4.6 Particulate Matter Limitation (PM) [326 IAC 6-2-4]**

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Pursuant to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from the boiler rated at 8.4 million British thermal units per hour shall in no case exceed 0.437 pounds of particulate matter per million British thermal units heat input.

## SECTION D.5 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches, soldering equipment, welding equipment.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5(a)]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.5.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brazing, cutting soldering and welding operations shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

## SECTION D.6

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) vacuum distillation unit, known as EU-VD 1, rated at 1.7 million British thermal units per hour, consisting of one (1) vacuum pot, one (1) vacuum column, and one(1) vacuum condenser, equipped with a 600 gallon distillate receiver, known as EU-TK 22, equipped with a catalytic thermal oxidizer, installed in 1997, exhausted through Stacks VD 1 and FI 1, capacity: 9,600 gallons per 24 hours, holding capacity: 3,300 gallons of solvent.
- (f) One (1) fractionation column No.1, known as EU-Col 1, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK18, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1983, exhausted through Stacks CV 1 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (g) One (1) fractionation column No.2, known as EU-Col 2, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK19, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1984, exhausted through Stacks CV 2 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (h) One (1) vacuum pump, known as EU-VP 1, rated at 275 cubic feet per minute peak, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks VP 1 and FI 1, installed in 1994.
- (i) One (1) pot still1, known as EU-DP 1, attached to 275 gallon distillate receiver, known as EU-TK20, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stack DP 1 and FI 1, installed in 1992, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (j) One (1) thin film evaporator No.1, known as EU-TF 1, equipped with a 450 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 1 and FI 1, installed in 1984, throughput capacity: 14,400 gallons of solvent per twenty-four (24) hour period.
- (k) One (1) thin film evaporator No.2, known as EU-TF 2, equipped with a 350 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 2 and FI 1, installed in 1990, throughput capacity: 14,400 gallons of solvent per 24 hours.
- (m) One (1) natural gas-fired fume incinerator (catalytic thermal oxidizer), known as FI 1, rated at 1.5 million British thermal units per hour, installed December 1997, exhausted through Stack FI 1, exhaust rate: 2,500 cubic feet per minute.
- (ee) One (1) product storage tank, known as EU-TK 30, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (ff) One (1) product storage tank, known as EU-TK 31, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (gg) One (1) product storage tank, known as EU-TK 32, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (hh) One (1) product storage tank, known as EU-TK 33, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (ii) One (1) product storage tank, known as EU-TK 34, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.

**Facility Description [326 IAC 2-7-5(15)] (continued)**

- (jj) One (1) product storage tank, known as EU-TK 35, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (kk) One (1) product storage tank, known as EU-TK 36, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (ll) One (1) product storage tank, known as EU-TK 37, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (mm) One (1) product storage tank, known as EU-TK 38, installed in 1983, capacity: 10,000 gallons of spent volatile organic compound waste.
- (nn) One (1) product storage tank, known as EU-TK 39, installed in 1983, vented to a catalytic thermal oxidizer, capacity: 12,000 gallons of spent volatile organic compound waste and still bottoms.
- (oo) One (1) product storage tank, known as EU-TK 40, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (pp) One (1) product storage tank, known as EU-TK 41, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (qq) One (1) product storage tank, known as EU-TK 42, installed in 1984, capacity: 5,100 gallons of process water.
- (rr) One (1) product storage tank, known as EU-TK 50, installed in 1992, capacity: 6,900 gallons of waste volatile organic compounds.
- (ss) One (1) product storage tank, known as EU-TK 51, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,800 gallons of volatile organic compounds and distillation heels.
- (tt) One (1) product storage tank, known as EU-TK 52, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (uu) One (1) product storage tank, known as EU-TK 53, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (vv) One (1) over pressurization temporary accumulation vessel, known as EU-V 61, attached to the catalytic thermal oxidizer, installed in 1997, capacity: 165 gallons.
- (xx) One (1) solid dispersion unit, known as EU-SD 1, consisting of one (1) 250 gallon tub and one (1) dispenser, exhausted through Stacks SD 1 and FI 1, vented to a catalytic thermal oxidizer, throughput capacity: 19,200 gallons per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.6.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]**

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart DD, Table 2.

**D.6.2 Off-site Waste and Recovery Operations NESHAP [326 IAC 20-23-1] [40 CFR Part 63, Subpart DD]**

These facilities are subject to 40 CFR Part 63, Subpart DD, which is incorporated by reference as 326 IAC 20-23-1, with a compliance date of February 1, 2000. A copy of this rule is attached.

- (a) Pursuant to 40 CFR 63.683(b)(1)(i), the Permittee shall control the air emissions from each affected off-site material management unit (EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, EU-TK 53, EU-SD 1) in accordance with the provisions listed below and 40 CFR 63.685 through 63.689:
  - (1) The Permittee shall control air emissions from tanks EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, and EU-TK 53 in accordance with the applicable standards specified in 40 CFR 63.685(b).
    - (A) Pursuant to 40 CFR 63.685(b)(1) and 40 CFR 63.685(c), the Permittee shall meet the following requirements for tanks EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 42, and EU-TK 50, using Tank Level 1 controls:
      - (i) The Permittee shall determine the maximum hazardous air pollutant (HAP) vapor pressure for an off-site material to be managed in each tank using Tank Level 1 controls before the first time the off-site material is placed in the tank, in accordance with 40 CFR 63.694(j) and Condition D.6.9(a). Thereafter, the Permittee shall perform a new determination whenever changes to the off-site material managed in the tank could potentially cause the maximum HAP vapor pressure to increase to a level that is equal to or greater than the maximum HAP vapor pressure limit for the tank design capacity category specified in Table 3 or Table 4 of 40 CFR 63, Subpart DD, as applicable to each tank; and,
      - (ii) The Permittee shall control air emissions from each tank in accordance with the provisions specified in 40 CFR 63, Subpart OO--National Emission Standards for Tanks--Level 1, and Condition D.6.3.
    - (B) Pursuant to 40 CFR 63.685(b)(4)(i), the Permittee shall control air emissions from tanks EU-TK39, EU-TK51, EU-TK52, EU-TK53 by venting each tank through a closed-vent system to the catalytic thermal oxidizer, FI 1, in accordance with the requirements specified in 40 CFR 63.685(g) and Condition D.6.4.
  - (2) Pursuant to 40 CFR 63.688(b)(3)(i), the Permittee shall control air emissions from container EU-SD 1 in accordance with the standards for Container Level 2 controls, as specified in 40 CFR 63, Subpart PP - National Emission Standards for Containers, and Condition D.6.5.
  - (3) Pursuant to 40 CFR 63.689(c)(2), for each transfer system, the Permittee shall control air emissions by operating a transfer system that consists of continuous hard-piping. All joints or seams between the pipe sections shall be permanently or semi-permanently sealed (e.g., a welded joint between two sections of metal pipe or a bolted and gasketed flange).

- (b) Pursuant to 40 CFR 63.683(c)(1)(i), the Permittee shall control the air emissions from process vents EU-VD 1/EU-TK 22, EU-Col1/EU-TK 18, EU-Col2/EU-TK 19, EU-VP 1, EU-DP 1/EU-TK 20, EU-TF 1, EU-TF 2, FI 1, EU-TK 40, EU-TK 41, and EU-V 61 in accordance with the standards specified in 40 CFR 63.690. Pursuant to 40 CFR 63.690, the Permittee shall route the vent stream from each process vent through a closed-vent system to the catalytic thermal oxidizer, FI 1, that meets the standards specified in 40 CFR 63.693 and Condition D.6.6.
- (c) Pursuant to 40 CFR 63.683(d), the Permittee shall control equipment leaks from each equipment component that is part of the affected source specified in 40 CFR 63.680 (c)(3) by implementing leak detection and control measures in accordance with the standards specified in 40 CFR 63.691(b) and Condition D.6.7.

D.6.3 National Emission Standards for Tanks - Level 1 [326 IAC 20-23-1] [40 CFR Part 63, Subpart OO]  
The provisions of Subpart OO – National Emission Standards for Tanks – Level 1 apply to the control of air emissions from tanks EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 42, and EU-TK 50, subject to 40 CFR 63.685(c) and Condition D.6.2(a)(1)(A).

- (a) Pursuant to 40 CFR 63.902(b), each tank shall be equipped with a fixed roof designed to meet the following specifications:
  - (1) The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface area of the liquid in the tank. The fixed roof may be a separate cover installed on the tank (e.g., a removable cover mounted on an open-top tank) or may be an integral part of the tank structural design (e.g., a horizontal cylindrical tank equipped with a hatch).
  - (2) The fixed roof shall be installed in a manner such that there are no visible cracks, holes, gaps, or other open spaces between roof section joints or between the interface of the roof edge and the tank wall.
  - (3) Each opening in the fixed roof, and any manifold system associated with the fixed roof, shall be either:
    - (A) Equipped with a closure device designed to operate such that when the closure device is secured in the closed position there are no visible cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the opening and the closure device; or,
    - (B) Connected by a closed-vent system that is vented to a control device. The control device shall remove or destroy organics in the vent stream, and shall be operating whenever regulated material is managed in the tank.
  - (4) The fixed roof and its closure devices shall be made of suitable materials that will minimize exposure of the regulated-material to the atmosphere, to the extent practical, and will maintain the integrity of the equipment throughout its intended service life, according to the provisions of 40 CFR 63.902(b)(4).
- (b) Pursuant to 40 CFR 63.902(c), whenever regulated material is in each tank, each fixed roof shall be installed with each closure device secured in the closed position, except as follows:
  - (1) Opening of closure devices or removal of the fixed roof is allowed at the following times:

- (A) To provide access to the tank for performing routine inspection, maintenance, or other activities needed for normal operations. Examples of such activities include those times when a worker needs to open a port to sample the liquid in the tank, or when a worker needs to open a hatch to maintain or repair equipment. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable, to the tank; and,
  - (B) To remove accumulated sludge or other residues from the bottom of tank.
- (2) Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the tank internal pressure in accordance with the tank design specifications. The device shall be designed to operate with no detectable organic emissions, as determined by Condition D.6.9 (b), when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever the tank internal pressure is within the internal pressure operating range determined by the Permittee based on the tank manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, combustible, explosive, reactive, or hazardous materials. Examples of normal operating conditions that may require these devices to open are during those times when the container internal pressure exceeds the internal pressure operating range for the tank as a result of loading operations or diurnal ambient temperature fluctuations.
  - (3) Opening of a safety device, as defined in 40 CFR 63.901, is allowed at any time conditions require it to do so to avoid an unsafe condition.

D.6.4 Requirements for Tanks with Maximum Organic Vapor Pressure Equal to or Greater than 76.6 kPa [326 IAC 20-23-1] [40 CFR 63.685(g)]

The provisions of 40 CFR 63.685(g) apply to the control of air emissions from tanks which are controlled by venting to a control device. The Permittee shall meet the requirements specified in items (a) and (b) below.

- (a) Pursuant to 40 CFR 63.685(g)(1), each tank shall be covered by a fixed roof and vented directly through a closed-vent system to the catalytic thermal oxidizer in accordance with items (1) through (4) below.
  - (1) The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface area of the liquid in the tank.
  - (2) Each opening in the fixed roof not vented to the catalytic thermal oxidizer shall be equipped with a closure device. The closure device shall be designed to operate with no detectable organic emissions in accordance with 40 CFR 63.694(k) and Condition D.6.9(c).
  - (3) The fixed roof and its closure devices shall be made of suitable materials that will minimize exposure of the off-site material to the atmosphere, to the extent practical, and will maintain the integrity of the equipment throughout its intended service life. Factors to be considered when selecting the materials for and designing the fixed roof and closure devices shall include: organic vapor permeability; the effects of any contact with the liquid and its vapor managed in the tank; the effects of outdoor exposure to wind, moisture, and sunlight; and the operating practices used for the tank on which the fixed roof is installed.

- (4) The closed-vent system and catalytic thermal oxidizer shall be designed and operated in accordance with the requirements of 40 CFR 63.693 and Condition D.6.6.
- (b) Pursuant to 40 CFR 63.685(g)(2), whenever an off-site material is in the tank, the fixed roof shall be installed with each closure device secured in the closed position and the vapor headspace underneath the fixed roof vented to the catalytic thermal oxidizer except as provided in items (1) and (2) below.
  - (1) Venting to the control device is not required, and opening of closure devices or removal of the fixed roof is allowed at the following times:
    - (A) To provide access to the tank for performing routine inspection, maintenance, or other activities needed for normal operations. Examples of such activities include those times when a worker needs to open a port to sample liquid in the tank, or when a worker needs to open a hatch to maintain or repair equipment. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable, to the tank; and,
    - (B) To remove accumulated sludge or other residues from the bottom of the tank.
  - (2) Opening of a safety device, as defined in 40 CFR 63.681, is allowed at any time conditions require it to do so to avoid an unsafe condition.

D.6.5 National Emission Standards for Containers [326 IAC 20-23-1] [40 CFR Part 63, Subpart PP]

The provisions of 40 CFR 63, Subpart PP – National Emission Standards for Containers, apply to the control of air emissions from containers subject to 40 CFR 63.688(b)(3) and Condition D.6.2(a) (2). The container EU-SD 1 shall be vented to the closed-vent system and to the catalytic thermal oxidizer meeting the requirements described in Condition D.6.6.

- (a) Pursuant to 40 CFR 63.688(b)(3), the Permittee shall control air emissions from the container, EU-SD 1, in accordance with Container Level 2 controls as specified in 40 CFR 63, Subpart PP.
- (b) Pursuant to 40 CFR 63.923(c), transfer of regulated material in to or out of the container shall be conducted in such a manner as to minimize exposure of the regulated material to the atmosphere, to the extent practical, considering the physical properties of the regulated material and good engineering and safety practices for handling flammable, ignitable, explosive, or other hazardous materials. Examples of container loading procedures that meet the requirements of this paragraph include using any one of the following: a submerged-fill pipe or other submerged-fill method to load liquids into the container; a vapor-balancing system or a vapor-recovery system to collect and control the vapors displaced from the container during filling operations; or a fitted opening in the top of a container through which the regulated material is filled, with subsequent purging of the transfer line before removing it from the container opening.

- (c) Pursuant to 40 CFR 63.923(d), whenever a regulated material is in the container, the Permittee shall install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except as provided in 40 CFR 63.923(d) and in (1) through (5) below.
  - (1) Opening of a closure device or cover is allowed for the purpose of adding material to the container as follows:
    - (A) In the case when the container is filled to the intended final level in one continuous operation, the Permittee shall promptly secure the closure devices in the closed position and install the covers, as applicable to the container, upon conclusion of the filling operation.
    - (B) In the case when discrete quantities or batches of material intermittently are added to the container over a period of time, the Permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon either the container being filled to the intended final level, the completion of a batch loading after which no additional material will be added to the container within 15 minutes, the person performing the loading operation leaves the immediate vicinity of the container, or the shutdown of the process generating the material being added to the container, whichever condition occurs first.
  - (2) Opening of a closure device or cover is allowed for the purpose of removing material from the container as follows:
    - (A) For the purpose of meeting the requirements of this condition, an empty container as defined in 40 CFR 63.921 may be open to the atmosphere at any time (e.g., covers and closure devices are not required to be secured in the closed position on an empty container).
    - (B) In the case when discrete quantities or batches of material are removed from the container but the container does not meet the conditions to be an empty container as defined in 40 CFR 63.921, the Permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the unloading operation leaves the immediate vicinity of the container, whichever condition occurs first.
  - (3) Opening of a closure device or cover is allowed when access inside the container is needed to perform routine activities other than transfer of regulated material. Examples of such activities include those times when a worker needs to open a port to measure the depth of or sample the material in the container, or when a worker needs to open a manhole hatch to access equipment inside the container. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable to the container.
  - (4) Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the container internal pressure in accordance with the container design specifications. The device shall be designed to operate with no detectable organic emissions, as determined by 40 CFR 63.925(a) and Condition D.6.9(c), when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever the container internal pressure is

within the internal pressure operating range determined by the Permittee based on container manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, combustible, explosive, reactive, or hazardous materials. Examples of normal operating conditions that may require these devices to open are during those times when the container internal pressure exceeds the internal pressure operating range for the container as a result of loading operations or diurnal ambient temperature fluctuations.

- (5) Opening of a safety device, as defined in 40 CFR 63.921, is allowed at any time conditions require it to do so to avoid an unsafe condition.
- (d) Pursuant to 40 CFR 63.923(f), for the purpose of compliance with 40 CFR 63.923(b)(1) and Condition D.6.5(a), the container shall meet the applicable U.S. DOT regulations on packaging hazardous materials for transportation as follows:
  - (1) The container shall meet the applicable requirements specified in 49 CFR Part 178--Specifications for Packagings or 49 CFR Part 179--Specifications for Tank Cars.
  - (2) Regulated-material is managed in the container in accordance with the applicable requirements specified in 49 CFR Part 107, Subpart B-- Exemptions; 49 CFR Part 172--Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements; 49 CFR Part 173--Shippers--General Requirements for Shipments and Packaging; and 49 CFR Part 180--Continuing Qualification and Maintenance of Packagings.
  - (3) For the purpose of complying with this condition, no exceptions to the 49 CFR Part 178 or Part 179 regulations are allowed except as provided for in paragraph (d)(4) of this condition.
  - (4) For a lab pack that is managed in accordance with the requirements of 49 CFR part 178 for the purpose of complying with this condition, the Permittee may comply with the exceptions for those packagings specified in 49 CFR 173.12(b).

D.6.6 Standards: Closed Vent Systems and Control Devices [326 IAC 20-23-1] [40 CFR 63.693]

The provisions of 40 CFR 63.693 apply to the closed-vent system and the catalytic thermal oxidizer, FI 1, used to control air emissions from the tanks, process vents, and containers with conditions that reference this condition and for which 40 CFR 63.685(g), 40 CFR 63.690, or 40 CFR 63.923 applies. The Permittee shall meet the requirements specified in items (a) through (c) below.

- (a) Pursuant to 40 CFR 63.693(b), the Permittee shall meet the following requirements for the closed-vent system and catalytic thermal oxidizer used to comply with this section:
  - (1) The closed-vent system shall meet the requirements specified in 40 CFR 63.693(c) and paragraph (b) of this condition.
  - (2) The catalytic thermal oxidizer shall meet the requirements specified in 40 CFR 63.693(f) and paragraph (c) of this condition.
  - (3) Whenever gases or vapors containing HAP are vented through the closed- vent system connected to the catalytic thermal oxidizer, the catalytic thermal oxidizer shall be operating except at the times listed in either paragraph (a)(3)(A) or (a)(3) (B) of this condition.

- (A) The catalytic thermal oxidizer may be bypassed for the purpose of performing planned routine maintenance of the closed-vent system or catalytic thermal oxidizer in situations when the routine maintenance cannot be performed during periods that the emission point vented to the catalytic thermal oxidizer is shutdown. On an annual basis, the total time that the closed-vent system or catalytic thermal oxidizer is bypassed to perform routine maintenance shall not exceed 240 hours per each calendar year.
  - (B) The catalytic thermal oxidizer may be bypassed for the purpose of correcting a malfunction of the closed-vent system or catalytic thermal oxidizer. The Permittee shall perform the adjustments or repairs necessary to correct the malfunction as soon as practicable after the malfunction is detected.
- (b) Pursuant to 40 CFR 63.693(c), the vent stream required to be controlled by Conditions D.6.2, D.6.4, and D.6.5 shall be conveyed to the catalytic thermal oxidizer by a closed-vent system that is designed to operate at a pressure below atmospheric pressure.
- (c) Pursuant to 40 CFR 63.693(f), the catalytic thermal oxidizer must achieve the following performance specifications:
  - (1) Pursuant to 40 CFR 63.693(f)(1)(i)(A), destroy the total organic compounds (TOC), less methane and ethane, contained in the vent stream entering the catalytic thermal oxidizer by 95 percent or more, on a weight-basis.
  - (2) Pursuant to 40 CFR 63.693(f)(2), the Permittee must use a design analysis of the catalytic thermal oxidizer to demonstrate compliance with paragraph (1) of this condition. The Permittee must include, as part of the design analysis, the information specified in 40 CFR 63.693(f)(2)(ii)(B) and Condition D.6.10(a).
  - (3) Pursuant to 40 CFR 63.693(f)(3), the Permittee must monitor the operation of the catalytic thermal oxidizer in accordance with 40 CFR 63.695(e) and Condition D.6.14(a).
- (d) The catalytic thermal oxidizer shall maintain the minimum catalyst bed inlet operating temperature and a minimum catalyst bed outlet operating temperature of 650 degrees Fahrenheit (EF) until the minimum catalyst bed inlet and outlet temperatures necessary to maintain a minimum 95% by weight overall destruction of the TOC, less methane and ethane, is determined by the design analysis conducted in accordance with Condition D.6.10. The Permittee shall apply for a minor permit modification to include the minimum catalyst bed inlet and outlet operating temperature values, as determined by the design analysis, upon approval of the design analysis by IDEM, OAM.

D.6.7 National Emission Standard for Equipment Leaks (Fugitive Emission Sources)[40 CFR 61, Subpart V] Pursuant to 40 CFR 63.683(d) and 40 CFR 63.691(b)(1), the Permittee shall control the HAP emitted from equipment leaks in accordance with 40 CFR 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources), Sections 61.242 through 61.247. The provisions apply to each equipment component that is part of the affected source, including components related to EU-VD 1/EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, EU-VP 1, EU-DP 1/EU-TK 20, EU-TF 1, EU-TF 2, FI 1, EU-TK 40, EU-TK 41, EU-V 61 EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, EU-TK 53, and EU-SD 1, that meet the criteria specified in 40 CFR 63.680(c)(3).

- (a) Pursuant to 40 CFR 61.242-1(d), each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.

- (b) Pursuant to 40 CFR 61.242-2 (Standards: Pumps), each pump shall be monitored in accordance with Condition D.6.15(a).
- (c) Pursuant to 40 CFR 61.242-4 (Standards: Pressure relief devices in gas/vapor service), the standards listed below apply to pressure relief devices in gas/vapor service.
  - (1) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 61.245(c).
  - (2) The following requirements apply regarding pressure releases:
    - (A) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 61.242-10 and Condition D.6.15 (e); and,
    - (B) No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored in accordance with Condition D.6.15(b).
  - (3) Any pressure relief device that is equipped with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device as described in 40 CFR 61.242-11 and paragraph (i) of this condition is exempt from the requirements of paragraphs (c)(1) and (2) of this condition. The four check valves designed to relieve pressure on the following units meet the requirements of this paragraph: EU-VD 1/EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, and EU-DP 1/EU-TK 20.
- (d) Pursuant to 40 CFR 61.242-5 (Standards: Sampling connecting systems), the standards listed below apply to sampling connecting systems.
  - (1) Each sampling connection system shall be equipped with a closed-purge system or closed vent system.
  - (2) Each closed-purge system or closed-vent system as required in paragraph (d)(1) shall:
    - (A) For the sampling systems for the units EU-VD 1, EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, and EU-DP 1/EU-TK 20, return the purged process fluid directly to the process line with zero volatile hazardous air pollutant (VHAP) emissions to the atmosphere; or,
    - (B) For the sampling systems for units EU-TF 1 and EU-TK 2, be designed and operated to capture and transport all the purged process fluid to the closed vent system and catalytic thermal oxidizer, FI 1.
- (e) Pursuant to 40 CFR 61.242-6 (Standards: Open-ended valves or lines), the standards listed below apply to open-ended valves or lines.
  - (1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in paragraph (e)(4) of this condition.

- (2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.
  - (3) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
  - (4) When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with paragraph (e)(1) of this condition at all other times.
- (f) Pursuant to 40 CFR 61.242-7 (Standards: Valves), each valve shall be monitored in accordance with Condition D.6.15(c).
- (g) Pursuant to 40 CFR 61.242-8 (Standards: Pressure relief devices in liquid service and flanges and other connectors), pressure relief devices in liquid service and flanges and other connectors shall be monitored in accordance with Condition D.6.15(d).
- (h) Pursuant to 40 CFR 61.242-9 (Standards: Product accumulator vessels), each product accumulator vessel shall be equipped with a closed-vent system capable of capturing and transporting any leakage from the vessel to the catalytic thermal oxidizer, FI 1.
- (i) Pursuant to 40 CFR 61.242-11 (Standards: Closed-vent systems and control devices), the Permittee shall comply with the provisions of this paragraph for the closed-vent system and catalytic thermal oxidizer .
- (1) The catalytic thermal oxidizer shall be designed and operated to reduce the VHAP emissions vented to it with an efficiency of 95 percent or greater.
  - (2) The Permittee shall monitor the catalytic thermal oxidizer and closed-vent system in accordance with the provisions in Condition D.6.15(f) and (g).
  - (3) Closed-vent systems shall be designed for and operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background and by visual inspections, as determined by the methods specified in 40 CFR 61.245(c).
  - (4) The closed-vent system and catalytic thermal oxidizer shall be operated at all times when emissions may be vented to them.

D.6.8 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions]]

Pursuant to 40 CFR 63, Subpart DD, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart DD. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. The plan shall be incorporated by reference into the source's Part 70 permit.

- (a) The purpose of the SSM plan is to –
- (1) Ensure that, at all times, the Permittee operates and maintains each facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;
  - (2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and
  - (3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).
- (b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain each facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.
- (c) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAM for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAM, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.
- (d) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAM.
- (e) IDEM, OAM shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAM may require that the Permittee make changes to the SSM plan for the source. IDEM, OAM may require reasonable revisions to a SSM plan, if IDEM, OAM finds that the plan:

- (1) Does not address a startup, shutdown, or malfunction event that has occurred;

- (2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or
  - (3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.
- (f) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

### **Compliance Determination Requirements**

#### **D.6.9 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63]**

- (a) To determine compliance with 40 CFR 63.685(c), the maximum HAP vapor pressure shall be determined using the procedures specified in 40 CFR 63.694(j) of Subpart DD.
- (b) Pursuant to 40 CFR 63, Subpart OO, the Permittee must demonstrate that no detectable organic emissions result from the pressure relief device described in Condition D.6.3(b)(2) by performing a test in accordance with 40 CFR 63.905.
- (c) The Permittee shall determine no detectable organic emissions for the purpose of complying with Condition D.6.4 and 40 CFR 63, Subpart DD, by following the procedure codified in 40 CFR 63.694(k).
- (d) Pursuant to 40 CFR 63, Subpart PP, the Permittee must demonstrate that no detectable organic emissions result from the pressure relief device described in Condition D.6.5(c)(4) by performing a test in accordance with 40 CFR 63.925(a).
- (e) When equipment is tested for compliance with or monitored for no detectable emissions in accordance with the standard for pressure relief devices in 40 CFR 61.242-4, the Permittee shall comply with the requirements in 40 CFR 61.245(c).
- (f) Pursuant to 40 CFR 61.242-1(b), compliance with 40 CFR 61, Subpart V, will be determined by a review of records, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 61.245.

#### **D.6.10 Catalytic Thermal Oxidizer Compliance Determination Requirements [326 IAC 2-7-6(1)] [40 CFR 63]**

- (a) Pursuant to 40 CFR 63.693(f)(2), the Permittee shall demonstrate that the catalytic thermal oxidizer achieves the applicable performance requirements in Conditions D.6.6(a) and (c) by performing a design analysis. The design analysis shall be conducted in accordance with 40 CFR 63.693(f)(2)(ii) and the following:
  - (1) The design analysis shall address the vent stream composition, constituent concentrations, and flow rate; and,
  - (2) The design analysis shall establish the design minimum and average temperatures across the catalyst bed inlet and outlet, and the design service life of the catalyst.

- (b) Pursuant to 40 CFR 63.693(c)(8), IDEM, OAM or the United States Environmental Protection Agency (US EPA) Administrator may request that the design analysis be revised or amended by the Permittee to correct any deficiencies identified by IDEM, OAM or the Administrator. If the Permittee and IDEM, OAM or the Administrator do not agree on the acceptability of using the design analysis (including any changes requested by IDEM, OAM or the Administrator) to demonstrate that the catalytic thermal oxidizer achieves the applicable performance requirements, then the disagreement must be resolved using the results of a performance test conducted by the Permittee in accordance with the requirements of 40 CFR 63.694(l).
- (1) IDEM, OAM or the Administrator may choose to have an authorized representative observe the performance test conducted by the Permittee.
- (2) Should the results of this performance test not agree with the determination of catalytic thermal oxidizer performance based on the design analysis, then the results of the performance test will be used to establish compliance.

**D.6.11 Catalytic Thermal Oxidizer and Closed-Vent System Compliance Determination Requirements**  
[326 IAC 2-7-6(1)] [40 CFR 63, Subpart DD]

- (a) Pursuant to 40 CFR 63.693(f)(3) and 40 CFR 63.695(e), the Permittee shall ensure that the catalytic thermal oxidizer operates properly in accordance with the performance requirements specified in Condition D.6.6 by monitoring the catalytic thermal oxidizer in accordance with the following requirements:
  - (1) A continuous monitoring system consisting of a temperature monitoring device capable of monitoring temperature at two locations equipped with a continuous recorder shall be installed and operated for the catalytic thermal oxidizer. One temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet and a second temperature sensor shall be installed at the nearest feasible point to the catalyst bed outlet.
    - (A) The continuous monitoring system shall measure either an instantaneous value at least once every 15 minutes or an average value for intervals of 15 minutes or less and continuously record either:
      - (i) Each measured data value; or
      - (ii) Each block average value for each 1-hour period or shorter periods calculated from all measured data values during each period. If values are measured more frequently than once per minute, a single value for each minute may be used to calculate the hourly (or shorter period) block average instead of all measured values.
    - (B) The continuous monitoring system must be installed, calibrated, operated, and maintained in accordance with the manufacturer's specifications or other written procedures that provide reasonable assurance that the monitoring equipment is operating properly.
  - (2) Using data recorded by the monitoring system, the Permittee must calculate the daily average value for each monitored operating parameter (i.e., temperature at catalyst bed inlet and outlet) for each operating day. If operation of the catalytic thermal oxidizer is continuous, the operating day is the total number of hours of catalytic thermal oxidizer operation per 24-hour period. Valid data points must be available for 75 percent of the operating hours in an operating day to compute the daily average.

- (3) For each monitored operating parameter, the Permittee must establish a minimum operating parameter value to define the range of conditions at which the catalytic thermal oxidizer must be operated to continuously achieve the performance requirements in Condition D.6.6 and 40 CFR 63.693(f). The Permittee must establish the minimum catalyst bed inlet and outlet temperatures based on the control device design analysis and supplemented, as necessary, by the catalytic thermal oxidizer manufacturer's recommendations or other applicable information.
- (4) An excursion for the catalytic thermal oxidizer is determined to have occurred when the monitoring data or lack of monitoring data result in any one of the criteria specified below being met. If both the catalyst bed inlet and outlet temperatures meet the excursion criterion specified below during the same operating day, then a single excursion is determined to have occurred for the catalytic thermal oxidizer for that operating day.
  - (A) An excursion occurs when the daily average value of a monitored parameter (i.e., the catalyst bed inlet or outlet temperature) is less than the minimum operating parameter limit established for the operating parameter in accordance with the requirements of paragraph (a)(3) of this condition.
  - (B) An excursion occurs when the period of catalytic thermal oxidizer operation is 4 hours or greater in an operating day and the monitoring data are insufficient to constitute a valid hour of data for at least 75 percent of the operating hours. Monitoring data are insufficient to constitute a valid hour of data if measured values are unavailable for any of the 15-minute periods within the hour.
  - (C) An excursion occurs when the period of catalytic thermal oxidizer operation is less than 4 hours in an operating day and more than 1 of the hours during the period does not constitute a valid hour of data due to insufficient monitoring. Monitoring data are insufficient to constitute a valid hour of data if measured values are unavailable for any of the 15-minute periods within the hour.
- (5) For each excursion, except as provided for in paragraph (a)(6) of this condition, the Permittee shall be deemed to have failed to have applied control in a manner that achieves the required operating parameter limits. Failure to achieve the required operating parameter limits is a violation of this condition and 40 CFR 63, Subpart DD.
- (6) An excursion is not a violation of this condition and 40 CFR 63, Subpart DD under any one of the conditions listed below.
  - (A) An excursion is not a violation nor does it count toward the number of excused excursions allowed under paragraph (6)(B) of this condition when the excursion occurs during any one of the following periods:
    - (i) During a period of startup, shutdown, or malfunction when the affected facility is operating during such period in accordance with the facility's startup, shutdown, and malfunction plan; or,
    - (ii) During periods of non-operation of the unit or the process that is vented to the catalytic thermal oxidizer (resulting in cessation of HAP emissions to which the monitoring applies).

- (B) One excused excursion is allowed per semi-annual period for any reason. The initial semi-annual period is the 6-month reporting period addressed by the first semi-annual report submitted by the Permittee in accordance with 40 CFR 63.697(b)(4) and Condition D.6.22.
- (7) Nothing in this condition shall be construed to allow or excuse a monitoring parameter excursion caused by any activity that violates other applicable provisions of 40 CFR 63, Subpart DD.
- (b) Pursuant to 40 CFR 63.693(c), the Permittee shall monitor the closed-vent system in accordance with the requirements listed below to ensure that the system is operated at a pressure below atmospheric pressure.
  - (1) The system shall be equipped with at least one pressure gage or other pressure measurement device that can be read from a readily accessible location to verify that negative pressure is being maintained in the closed-vent system when the catalytic thermal oxidizer is operating.
  - (2) In situations when the closed-vent system includes bypass devices that could be used to divert the vent stream from the closed vent system to the atmosphere at a point upstream of the catalytic thermal oxidizer inlet, each bypass device must be equipped with a flow indicator, as specified in 40 CFR 63.693 (c)(2)(i), which meets the following requirements:
    - (A) The indicator must be installed at the entrance to the bypass line used to divert the vent stream from the closed-vent system to the atmosphere; and,
    - (B) The flow indicator must indicate a reading at least once every 15 minutes.
- Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, or pressure relief valves needed for safety reasons are not subject to the requirements of this paragraph of the condition.
- (c) Pursuant to 40 CFR 63.695(f), following the initial inspection and monitoring of a piece of air pollution control equipment in accordance with the applicable provisions of 40 CFR 63.695 and this condition, subsequent inspection and monitoring of the equipment may be performed at intervals longer than 1 year when the Permittee determines that performing the required inspection or monitoring procedures would expose a worker to dangerous, hazardous, or otherwise unsafe conditions and the Permittee complies with the requirements specified in paragraphs (1) and (2) below.
  - (1) The Permittee must prepare and maintain at the plant site written documentation identifying the specific air pollution control equipment designated as "unsafe to inspect and monitor". The documentation must include for each piece of air pollution control equipment designated as such a written explanation of the reasons why the equipment is unsafe to inspect or monitor using the applicable procedures under 40 CFR 63.695.

- (2) The Permittee must develop and implement a written plan and schedule to inspect and monitor the air pollution control equipment using the applicable procedures specified in 40 CFR 63.695 during times when a worker can safely access the air pollution control equipment. The required inspections and monitoring must be performed as frequently as practicable but do not need to be performed more frequently than the periodic schedule that would otherwise be applicable to the air pollution control equipment under the provisions of 40 CFR 63.695. A copy of the written plan and schedule must be maintained at the plant site.
- (d) Pursuant to 40 CFR 61.242-11(e), the Permittee shall monitor the catalytic thermal oxidizer to ensure that it is operated and maintained in conformance with its design.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.6.12 Monitoring Procedures for Tanks with Level 1 Controls [326 IAC 2-7-6(1)] [40 CFR 63, Subpart OO]  
Pursuant to 40 CFR 63, Subpart OO, the Permittee shall inspect and monitor each tank equipped with Level 1 controls in accordance with the requirements specified in 40 CFR 63.906(a) and (b).

- (a) The Permittee shall meet the following inspection requirements:
  - (1) The fixed roof and its closure devices shall be visually inspected by the Permittee to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices.
  - (2) The Permittee shall perform an initial inspection following the installation of each fixed roof. Thereafter, the Permittee shall perform the inspections at least once every calendar year except as provided for in 40 CFR 63.906(d).
  - (3) In the event that a defect is detected, the Permittee shall repair the defect in accordance with the requirements of paragraph (b) of this condition.
- (b) The Permittee shall repair all detected defects as follows:
  - (1) The Permittee shall make first efforts at repair of the defect no later than five (5) calendar days after detection and repair shall be completed as soon as possible but no later than 45 calendar days after detection except as provided in paragraph (b)(2) of this condition.
  - (2) Repair of a defect may be delayed beyond 45 calendar days if the Permittee determines that repair of the defect requires emptying or temporary removal from service of the tank and no alternative tank capacity is available at the site to accept the regulated material normally managed in the tank. In this case, the Permittee shall repair the defect the next time alternative tank capacity becomes available and the tank can be emptied or temporarily removed from service, as necessary to complete the repair.

D.6.13 Monitoring Procedures for Tanks with Maximum Organic Vapor Pressure Equal to or Greater than 76.6kPa [326 IAC 2-7-6(1)] [40 CFR 63, Subpart DD]  
Pursuant to 40 CFR 63.695(b), the tanks, EU-TK39, EU-TK51, EU-TK52, and EU-TK53, equipped with a fixed roof in accordance with the provisions of 40 CFR 63.685(g) shall meet the requirements in items (a) and (b) below.

- (a) Pursuant to 40 CFR 63.695(b)(3), the Permittee shall meet the following inspection requirements for each tank:
  - (1) The fixed roof and its closure devices shall be visually inspected by the Permittee to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the separator wall; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. In the case when a tank is buried partially or entirely underground, inspection is required only for those portions of the cover that extend to or above the ground surface, and those connections that are on such portions of the cover (e.g., fill ports, access hatches, gauge wells, etc.) and can be opened to the atmosphere.
  - (2) The Permittee shall perform an initial inspection following installation of the fixed roof. Thereafter, the Permittee shall perform the inspections at least once every calendar year except as provided for under 40 CFR 63.695(f).
  - (3) In the event that a defect is detected, the Permittee shall repair the defect in accordance with the requirements of paragraph (b) of this condition.
- (b) Pursuant to 40 CFR 63.695(b)(4), the Permittee shall repair each defect detected during an inspection performed in accordance with the requirements in paragraph (a) of this condition in the following manner:
  - (1) The Permittee shall, within 45 calendar days of detecting the defect, either repair the defect or empty the tank and remove it from service. If within this 45-day period the defect cannot be repaired or the tank cannot be removed from service without disrupting operations at the plant site, the Permittee is allowed two 30-day extensions.
  - (2) In cases when the Permittee elects to use a 30-day extension, the Permittee shall prepare and maintain documentation describing the defect, explaining why alternative storage capacity is not available, and specify a schedule of actions that will ensure that the control equipment will be repaired or the tank emptied as soon as possible.
  - (3) When a defect is detected during an inspection of a tank that has been emptied and degassed, the Permittee shall repair the defect before refilling the tank.

D.6.14 Monitoring Procedures for Containers [326 IAC 2-7-6(1)] [40 CFR 63, Subpart DD and Subpart PP]  
Pursuant to 40 CFR 63.926(a) and 40 CFR 63.923(e), the Permittee shall inspect the container and its cover and closure devices as follows:

- (a) In the case when a regulated material already is in the container at the time the Permittee first accepts possession of the container at the facility site and the container is not emptied (i.e., does not meet the conditions for an empty container as defined in 40 CFR 63.921) within 24 hours after the container has been accepted at the facility site, the container and its cover and closure devices shall be visually inspected by the Permittee to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. This inspection of the container must be conducted on or before the date that the container is accepted at the facility (i.e., the date that the container becomes subject to the standards under 40 CFR 63, Subpart PP). For the purpose of this requirement, the date of acceptance is the date of signature of the Permittee on the manifest or shipping papers accompanying the container. If a defect is detected, the Permittee shall repair the defect in accordance with the requirements of 40 CFR 63.926(a)(3) and paragraph (c) of this condition.

- (b) In the case when a container filled or partially filled with regulated material remains unopened at the facility site for a period of 1 year or more, the container and its cover and closure devices shall be visually inspected by the Permittee initially and thereafter, at least once every calendar year, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the Permittee shall repair the defect in accordance with the requirements of 40 CFR 63.926(a)(3) and paragraph (c) of this condition.
- (c) When a defect is detected for the container, cover, or closure devices, the Permittee shall either empty the regulated material from the defective container in accordance with paragraph (c)(1) of this condition or repair the defective container in accordance with paragraph (c)(2) of this condition.
  - (1) If the Permittee elects to empty the regulated material from the defective container, the Permittee shall remove the regulated material from the defective container to meet the conditions for an empty container, as defined in 40 CFR 63.921, and transfer the removed regulated material to either a container that meets the applicable standards under 40 CFR 63, Subpart PP or treatment unit that meets the applicable standards under 40 CFR 63, Subpart DD. Transfer of the regulated material must be completed no later than 5 calendar days after detection of the defect. The emptied defective container must be either repaired, destroyed, or used for purposes other than management of regulated material.
  - (2) If the Permittee elects not to empty the regulated material from the defective container, the Permittee must repair the defective container. First efforts at repair of the defect must be made no later than 24 hours after detection and repair must be completed as soon as possible but no later than 5 calendar days after detection. If repair of a defect cannot be completed within 5 calendar days, then the regulated material must be emptied from the container and the container must not be used to manage regulated material until the defect is repaired.

D.6.15 Monitoring Procedures for Catalytic Thermal Oxidizer and Closed-Vent System [326 IAC 2-7-6(1)]  
[40 CFR 63, Subpart DD]

Pursuant to 40 CFR 63.693(b)(4) and 40 CFR 63.695(c)(2) and (3), to determine compliance with Condition D.6.6, the Permittee shall meet the following inspection and monitoring requirements for the closed-vent system:

- (a) The closed-vent system shall be visually inspected by the Permittee to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in ductwork or piping; loose connections; or broken or missing caps or other closure devices.
- (b) The Permittee shall perform an initial inspection following installation of the closed-vent system. Thereafter, The Permittee must perform the inspections at least once every calendar year except as provided for in paragraph (d) of this condition.
- (c) In the event that a defect is detected, the Permittee shall repair the defect in accordance with the requirements of 40 CFR 63.695(c)(3) and of paragraph (b)(4) of this condition.
- (d) The Permittee shall repair all detected defects as follows:
  - (1) The Permittee shall make first efforts at repair of a defect no later than 5 calendar days after detection and repair shall be completed as soon as possible but no later than 45 calendar days after detection.

- (2) Repair of a defect may be delayed beyond 45 calendar days if either of the conditions specified below occurs. In this case, the Permittee must repair the defect the next time the process or unit that vents to the closed-vent system is shutdown. Repair of the defect must be completed before the process or unit resumes operation.
  - (A) Completion of the repair is technically infeasible without the shutdown of the process or unit that vents to the closed-vent system.
  - (B) The Permittee determines that the air emissions resulting from the repair of the defect within the specified period would be greater than the fugitive emissions likely to result by delaying the repair until the next time the process or unit that vents to the closed-vent system is shutdown.

**D.6.16 Monitoring Procedures for Equipment Leaks [326 IAC 2-7-6(1)] [40 CFR 61, Subpart V][40 CFR 63, Subpart DD]**

Pursuant to 40 CFR 61, Subpart V, the Permittee must conduct monitoring in accordance with the paragraphs listed below to comply with leak detection requirements.

- (a) Pursuant to 40 CFR 61.242-2, the following standards apply to pumps:
  - (1) Each pump shall be monitored monthly to detect leaks by the methods specified in 40 CFR 61.245(b).
  - (2) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
  - (3) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
  - (4) If there are indications of liquids dripping from the pump seal, a leak is detected.
  - (5) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after each leak is detected, except as provided in 40 CFR 61.242-10 and paragraph (e) of this condition.
  - (6) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (b) Pursuant to 40 CFR 61.242-4(b)(2), no later than 5 calendar days after a pressure release, the pressure relief device in gas/vapor service shall be monitored to confirm the condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 61.245(c).
- (c) Pursuant to 40 CFR 61.242-7, the standards listed below apply to valves.
  - (1) Each valve shall be monitored monthly to detect leaks by the method specified in 40 CFR 61.245(b).
  - (2) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
  - (3) Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected.
  - (4) If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.

- (5) When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after the leak is detected, except as provided in 40 CFR 61.242-10 and paragraph (e) of this condition.
- (6) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (7) First attempts at repair include, but are not limited to, the following best practices where practicable:
  - (A) Tightening of bonnet bolts;
  - (B) Replacement of bonnet bolts;
  - (C) Tightening of packing gland nuts; and,
  - (D) Injection of lubricant into lubricated packing.
- (d) Pursuant to 40 CFR 61.242-8, pressure relief devices in liquid service and flanges and other connectors shall be monitored within 5 days by the method specified in 40 CFR 61.245(b) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method.
  - (1) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
  - (2) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 61.242-10 and paragraph (e) of this condition.
  - (3) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
  - (4) First attempts at repair include, but are not limited to, the best practices described under 40 CFR 61.242-7(e) and paragraph (c)(7) of this condition.
- (e) Pursuant to 40 CFR 61.242-10 (Standards: Delay of Repair), the standards listed below apply to delay of repair of equipment.
  - (1) Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.
  - (2) Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the process that does not remain in VHAP service.
  - (3) Delay of repair for valves will be allowed if:
    - (A) The Permittee demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair; and,
    - (B) When repair procedures are affected, the purged material is collected and destroyed or recovered in the catalytic thermal oxidizer.
  - (4) Delay of repair for pumps will be allowed if:

- (A) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system; and
  - (B) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
- (5) Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
- (f) Pursuant to 40 CFR 61.242-11(f), the monitoring requirements listed below apply to the closed-vent system.
  - (1) Closed-vent systems shall be monitored to determine compliance with 40 CFR 61.242-11 initially in accordance with 40 CFR 61.05, annually, and at other times requested by the US EPA Administrator or IDEM, OAM.
  - (2) Leaks, as indicated by an instrument reading greater than 500 ppm and visual inspections, shall be repaired as soon as practicable, but not later than 15 calendar days after the leak is detected.
  - (3) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19][40 CFR 63]**

**D.6.17 General Record Keeping Requirements [40 CFR 63, Subpart A] [40 CFR 63, Subpart DD]**

- (a) Pursuant to 40 CFR 63.696(a), the Permittee shall comply with the record keeping requirements in 40 CFR 63.10, under 40 CFR 63 Subpart A – General Provisions, that are applicable to 40 CFR 63, Subpart DD, as specified in Table 2 of Subpart DD.

- (b) Pursuant to 40 CFR 63.6(e)(3), to document compliance with the SSM Plan requirement, the Permittee shall comply with the record keeping requirements of this paragraph.
  - (1) When actions taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the SSM Plan, the Permittee shall keep records for that event in accordance with 40 CFR 63.6(e)(3)(iii).
  - (2) If an action taken by the Permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the SSM Plan, the Permittee shall record the actions taken for that event in accordance with 40 CFR 63.6(e)(3)(iv).

**D.6.18 Record Keeping Requirements for Tanks with Level 1 Controls [40 CFR 63, Subpart DD] [40 CFR 63, Subpart OO]**

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Pursuant to 40 CFR 63.907, to document compliance with Conditions D.6.3 and D.6.11 and 40 CFR 63, Subpart OO, the Permittee shall maintain records in accordance items (a) through (c) below.

- (a) The Permittee shall prepare and maintain a record for each tank subject to 40 CFR 63, Subpart OO that includes the following information:
  - (1) A tank identification number (or other unique identification description as selected by the Permittee);
  - (2) A description of the tank dimensions and the tank design capacity; and,
  - (3) The date that each inspection required by Condition D.6.12 is performed.
- (b) The Permittee shall record the following information for each defect detected during inspections required by 40 CFR 63.906 and Condition D.6.12:
  - (1) The location of the defect;
  - (2) A description of the defect;
  - (3) The date of detection; and,
  - (4) Corrective action taken to repair the defect.
- (c) In the event that repair of the defect is delayed in accordance with the provisions of 40 CFR 63.907(b)(2), the Permittee shall also record the reason for the delay and the date that completion of repair of the defect is expected.

**D.6.19 Record Keeping Requirements for Tanks with Maximum Organic Vapor Pressure Equal to or Greater than 76.6kPa [40 CFR 63, Subpart DD] [40 CFR 63, Subpart OO]**

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To document compliance with Conditions D.6.4 and D.6.12 and D.6.14 and 40 CFR 63, Subpart DD, the Permittee shall maintain records in accordance with 40 CFR 63.696(e) and 40 CFR 63.695(b)(4) (i).

- (a) Pursuant to 40 CFR 63.696(e), the Permittee shall prepare and maintain the following records for tanks using a fixed roof to comply with the tank control requirements specified in 40 CFR 63.685(g) and Condition D.6.4:

- (1) A record for each inspection required by 40 CFR 63.695(b) and conditions D.6.12 and D.6.14, as applicable to the tank, that includes the following information: a tank identification number (or other unique identification description as selected by the Permittee) and the date of inspection.
- (2) The Permittee shall record for each defect detected during inspections required by 40 CFR 63.695(b) and Conditions D.6.12 and D.6.14 the following information:
  - (A) The location of the defect;
  - (B) A description of the defect;
  - (C) The date of detection; and,
  - (D) Corrective action taken to repair the defect.
- (b) In the event that repair of the defect is delayed in accordance with the provisions of 40 CFR 63.695(b)(4) and Condition D.6.13, the Permittee shall also record the reason for the delay and the date that completion of repair of the defect is expected.
- (c) Pursuant to 40 CFR 63.695(b)(4)(i), in cases when the Permittee elects to use a 30-day extension to repair a defect, the Permittee shall prepare and maintain documentation describing the defect, explaining why alternative storage capacity is not available, and specify a schedule of actions that will ensure that the control equipment will be repaired or the tank emptied as soon as possible.

**D.6.20 Record Keeping Requirements for Catalytic Thermal Oxidizer and Closed-Vent System [40 CFR 63, Subpart DD]**

- (a) Pursuant to 40 CFR 63.696(b), the Permittee shall maintain the records for the catalytic thermal oxidizer in accordance with the requirements of 40 CFR 63.10.
- (b) To document compliance with Condition D.6.6 and D.6.15, the Permittee shall maintain records for the closed-vent system and catalytic thermal oxidizer in accordance with the requirements of 40 CFR 63.696.
  - (1) Pursuant to 40 CFR 63.696(g), the Permittee shall record, on a semi-annual basis, the information specified below for those planned routine maintenance operations that would require the catalytic thermal oxidizer not to meet the requirements of 40 CFR 63.693(f).
    - (A) The Permittee shall record a description of the planned routine maintenance that is anticipated to be performed for the catalytic thermal oxidizer during the next 6 months. This description shall include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods.
    - (B) The Permittee shall record a description of the planned routine maintenance that was performed for the catalytic thermal oxidizer during the previous 6 months. This description shall include the type of maintenance performed and the total number of hours during these 6 months that the catalytic thermal oxidizer did not meet the requirements of 40 CFR 63.693(f), as applicable, due to planned routine maintenance.

- (2) Pursuant to 40 CFR 63.696(h), the Permittee shall record the following information for those unexpected control device system malfunctions that would require the catalytic thermal oxidizer not to meet the requirements of 40 CFR 63.693(f), as applicable:
  - (A) The occurrence and duration of each malfunction of the control device system;
  - (B) The duration of each period during a malfunction when gases, vapors, or fumes are vented from the waste management unit through the closed-vent system to the catalytic thermal oxidizer while the catalytic thermal oxidizer is not properly functioning; and,
  - (C) Actions taken during periods of malfunction to restore a malfunctioning control device to its normal or usual manner of operation.
- (3) Pursuant to 40 CFR 63.695(c)(2)(iv), the Permittee shall maintain a record of inspections performed in accordance with 40 CFR 63.695(c).
- (4) Pursuant to 40 CFR 63.695(c)(3)(iii), the Permittee shall maintain a record of defect repair.
- (c) Pursuant to 40 CFR 63.693(c)(2)(i) and Condition D.6.15(c)(2)(A), the Permittee shall maintain records of the following information: hourly records of whether the flow indicator was operating and whether flow was detected at any time during the hour; and records of all periods when flow is detected or the flow indicator is not operating.

D.6.21 Record Keeping Requirements for Equipment Leaks [40 CFR 63, Subpart DD] [40 CFR 61, Subpart V]  
Pursuant to 40 CFR 61.246, the Permittee shall comply with the record keeping requirements of this paragraph.

- (a) The Permittee may comply with the record keeping requirements for the process units in one record keeping system if the system identifies each record by each process unit.
- (b) When each leak is detected as specified in 40 CFR 61, Sections 242-2, 242-7, and 242-8 and in Condition D.6.16, the following requirements apply:
  - (1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
  - (2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in 40 CFR 61.242-7(c) and Condition D.6.16 and no leak has been detected during those 2 months.
  - (3) The identification on equipment, except on a valve, may be removed after it has been repaired.
- (c) When each leak is detected as specified in 40 CFR 61, Sections 242-2, 242-7, and 242-8 and in Condition D.6.16, the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location:

- (1) The instrument and operator identification numbers and the equipment identification number;
  - (2) The date the leak was detected and the dates of each attempt to repair the leak;
  - (3) Repair methods applied in each attempt to repair the leak;
  - (4) "Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 61.245(a) after each repair attempt is equal to or greater than 10,000 ppm.
  - (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak;
  - (6) The signature of the Permittee (or designate) whose decision it was that the repair could not be effected without a process shutdown;
  - (7) The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days;
  - (8) Dates of process unit shutdowns that occur while the equipment is unrepaired; and,
  - (9) The date of successful repair of the leak.
- (d) The following information pertaining to the design requirements for the closed-vent system and catalytic thermal oxidizer shall be recorded and kept in a readily accessible location:
- (1) Detailed schematics, design specifications, and piping and instrumentation diagrams;
  - (2) The dates and descriptions of any changes in the design specifications;
  - (3) A description of the parameter or parameters monitored, as required in 40 CFR 61.242-11(e) and Condition D.6.16, to ensure that the catalytic thermal oxidizer is operated and maintained in conformance with its design and an explanation of why that parameter (or parameters) was selected for the monitoring;
  - (4) Periods when the closed-vent system and catalytic thermal oxidizer are not operated as designed; and,
  - (5) Dates of startups and shutdowns of the closed-vent system and catalytic thermal oxidizer.
- (e) The following information pertaining to all equipment to which a standard applies shall be recorded in a log that is kept in a readily accessible location:
- (1) A list of identification numbers for equipment (except welded fittings) subject to the requirements of 40 CFR 61, Subpart V;
  - (2) A list of identification numbers for equipment that the Permittee elects to designate for no detectable emissions as indicated by an instrument reading of less than 500 ppm above background. The designation of this equipment for no detectable emissions shall be signed by the Permittee;
  - (3) A list of equipment identification numbers for pressure relief devices required to comply with 40 CFR 61.242-4(a) and Condition D.6.7(c)(1); and,

- (4) The following information for each compliance test required in 40 CFR 61.242-4 and Condition D.6.7(c)(1):
  - (A) The dates of each compliance test required in 40 CFR 61.242-4 and Condition D.6.7(c)(1);
  - (B) The background level measured during each compliance test; and,
  - (C) The maximum instrument reading measured at the equipment during each compliance test.

D.6.22 Reporting Requirements [40 CFR 63, Subpart A] [40 CFR 63, Subpart DD] [40 CFR 61, Subpart V]

- (a) Pursuant to 40 CFR 63.697(a), the Permittee shall comply with the notification requirements specified in paragraph (a)(1) of this condition and the reporting requirements specified in paragraph (a)(2) of this condition.
  - (1) The Permittee submitted an initial notification in accordance with 40 CFR 63.9(b) on April 7, 1997.
  - (2) The Permittee must submit reports to the US EPA Administrator and IDEM, OAM in accordance with the applicable reporting requirements in 40 CFR 63.10 as specified in Table 2 of 40 CFR 63, Subpart DD.
- (b) Pursuant to 40 CFR 63.697(b), the Permittee shall submit the following notifications and reports regarding the closed-vent system and catalytic thermal oxidizer to the US EPA Administrator and IDEM, OAM:
  - (1) A Notification of Performance Tests specified in 40 CFR 63.7 and 40 CFR 63.9(g);
  - (2) Performance test reports specified in 40 CFR 63.10(d)(2);
  - (3) Startup, shutdown, and malfunction reports specified in 40 CFR 63.10(d)(5);
    - (A) If actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee shall state such information in the report. The startup, shutdown, or malfunction report shall consist of a letter, containing the name, title, and signature of the responsible official who is certifying its accuracy, that shall be submitted to the US EPA Administrator and IDEM, OAM; and,
    - (B) Separate startup, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (b) (4) of this condition.
  - (4) A summary report specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis (i.e., once every 6-month period).

- (A) The summary report must include a description of all excursions as defined in 40 CFR 63.695(e) that have occurred during the 6-month reporting period.
  - (B) For each excursion caused when the daily average value of a monitored operating parameter is less than the minimum operating parameter limit, the report must include the daily average values of the monitored parameter, the applicable operating parameter limit, and the date and duration of the period that the exceedance occurred.
  - (C) For each excursion caused by lack of monitoring data, the report must include the date and duration of the period when the monitoring data were not collected and the reason why the data were not collected.
- (c) Pursuant to 40 CFR 61.247, the Permittee shall comply with the reporting requirements of this paragraph.
  - (1) The Permittee shall submit a statement in writing notifying the US EPA Administrator and IDEM, OAM that the requirements of 40 CFR 61.242, 61.245, 61.246, and 61.247 are being implemented.
    - (A) The statement is to be submitted within 90 days of the effective date;
    - (B) The statement is to contain the following information for each source:
      - (i) Equipment identification number and process unit identification;
      - (ii) Type of equipment (for example, a pump or pipeline valve);
      - (iii) Percent by weight VHAP in the fluid at the equipment;
      - (iv) Process fluid state at the equipment (gas/vapor or liquid); and,
      - (v) Method of compliance with the standard (for example, "monthly leak detection and repair" or "equipped with dual mechanical seals").
  - (2) A report shall be submitted to the US EPA Administrator and IDEM, OAM semi-annually starting 6 months after the initial report required in paragraph (1) of this condition, that includes the following information:
    - (A) Process unit identification;
    - (B) For each month during the semi-annual reporting period:
      - (i) Number of valves for which leaks were detected as described in 40 CFR 61.242-7(b) and Condition D.6.16(c)(2);
      - (ii) Number of valves for which leaks were not repaired as required in 40 CFR 61.242-7(d) and Condition D.6.16(c)(5);
      - (iii) Number of pumps for which leaks were detected as described in 40 CFR 61.242-2(b) and Conditions D.6.16(a)(3) and (4);
      - (iv) Number of pumps for which leaks were not repaired as required in 40 CFR 61.242-2(c) and Condition D.6.16(a)(5) and (6); and,

- (v) The facts that explain any delay of repairs and, where appropriate, why a process unit shutdown was technically infeasible.
  - (C) Dates of process unit shutdowns which occurred within the semi-annual reporting period;
  - (D) Revisions to items reported according to paragraph (c)(1) of this condition if changes have occurred since the initial report or subsequent revisions to the initial report; and,
  - (E) The results of all performance tests and monitoring to determine compliance with no detectable emissions conducted within the semi-annual reporting period.
- (3) In the first report submitted as required in paragraph (c)(1) of this condition, the report shall include a reporting schedule stating the months that semi-annual reports shall be submitted. Subsequent reports shall be submitted according to that schedule, unless a revised schedule has been submitted in a previous semi-annual report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Reclaimed Energy Company, Inc.  
Source Address: 1500 Western Avenue, Connersville, Indiana 47331  
Mailing Address: 1500 Western Avenue, Connersville, Indiana 47331  
Part 70 Permit No.: T 041-6719-00015

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Reclaimed Energy Company, Inc.  
Source Address: 1500 Western Avenue, Connersville, Indiana 47331  
Mailing Address: 1500 Western Avenue, Connersville, Indiana 47331  
Part 70 Permit No.: T 041-6719-00015

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - C** The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

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Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
NATURAL GAS-FIRED BOILER CERTIFICATION**

Source Name: Reclaimed Energy Company, Inc.  
Source Address: 1500 Western Avenue, Connersville, Indiana 47331  
Mailing Address: 1500 Western Avenue, Connersville, Indiana 47331  
Part 70 Permit No.: T 041-6719-00015

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To


I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

A certification by the responsible official, as defined by 326 IAC 2-7-1(34), is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: Reclaimed Energy Company, Inc.  
Source Address: 1500 Western Avenue, Connersville, Indiana 47331  
Mailing Address: 1500 Western Avenue, Connersville, Indiana 47331  
Part 70 Permit No.: T 041-6719-00015

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Operating Permit  
and Enhanced New Source Review (ENSR)**

**Source Background and Description**

<b>Source Name:</b>	<b>Reclaimed Energy Company, Inc.</b>
<b>Source Location:</b>	<b>1500 Western Avenue, Connersville, Indiana 47331</b>
<b>County:</b>	<b>Fayette</b>
<b>SIC Code:</b>	<b>7389, 7398, 7299, 2869</b>
<b>Operation Permit No.:</b>	<b>T 041-6719-00015</b>
<b>Permit Reviewer:</b>	<b>Mark L. Kramer</b>

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Reclaimed Energy Company, Inc. relating to the operation of a chemical recycling source.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) vacuum distillation unit, known as EU-VD 1, rated at 1.7 million British thermal units per hour, consisting one (1) vacuum pot, one (1) vacuum column, and one(1) vacuum condenser, equipped with a 600 gallon distillate receiver, known as EU-TK 22, equipped with a catalytic thermal oxidizer, installed in 1997, exhausted through Stacks VD 1 and FI 1, capacity: 9,600 gallons per 24 hours, holding capacity: 3,300 gallons of solvent.
- (b) One (1) product storage tank, known as EU-TK 23, to be installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (c) One (1) product storage tank, known as EU-TK 24, to be installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (d) One (1) product storage tank, known as EU-TK 25, to be installed in 1998, capacity: 2,000 gallons of volatile organic compounds.

**Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR**

The source also consists of the following unpermitted facilities/units:

- (e) One (1) natural gas-fired fire tube boiler, known as EU-BO 1, installed in 1981, exhausted through Stack S 1, rated at 25.11 million British thermal units per hour.

- (f) One (1) fractionation column No.1, known as EU-Col 1, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK18, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1983, exhausted through Stacks CV 1 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (g) One (1) fractionation column No.2, known as EU-Col 2, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK19, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1984, exhausted through Stacks CV 2 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (h) One (1) vacuum pump, known as EU-VP 1, rated at 275 cubic feet per minute peak, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks VP 1 and FI 1, installed in 1994.
- (i) One (1) pot still1, known as EU-DP 1, attached to 275 gallon distillate receiver, known as EU-TK20, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stack DP 1 and FI 1, installed in 1992, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (j) One (1) thin film evaporator No.1, known as EU-TF 1, equipped with a 450 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 1 and FI 1, installed in 1984, throughput capacity: 1,440 gallons of solvent per twenty-four (24) hour period.
- (k) One (1) thin film evaporator No.2, known as EU-TF 2, equipped with a 350 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 2 and FI 1, installed in 1990, throughput capacity: 14,400 gallons of solvent per 24 hours.
- (l) One (1) mixed solvent (molecular sieve) dryer, known as EU-MS 1, installed in 1995, exhausted through Stack MS1, capacity: 6,500 gallons per batch, one (1) batch per 13.5 hours.
- (m) One (1) natural gas-fired fume incinerator (catalytic thermal oxidizer), known as FI 1, rated at 1.5 million British thermal units per hour, installed December 1997, exhausted through Stack FI 1, exhaust rate: 2,500 cubic feet per minute.
- (n) One (1) product storage tank, known as EU-TK 1, installed in 1990, capacity: 6,500 gallons of volatile organic compounds.
- (o) One (1) product storage tank, known as EU-TK 2, installed in 1981, capacity: 6,800 gallons of volatile organic compounds.
- (p) One (1) product storage tank, known as EU-TK 3, installed in 1983, capacity: 6,000 gallons of volatile organic compounds.
- (q) One (1) product storage tank, known as EU-TK 4, installed in 1983, capacity: 4,500 gallons of volatile organic compounds.
- (r) One (1) product storage tank, known as EU-TK 5, installed in 1985, capacity: 2,150 gallons of volatile organic compounds.
- (s) One (1) product storage tank, known as EU-TK 6, installed in 1985, capacity: 1,000 gallons of volatile organic compounds.

- (t) One (1) product storage tank, known as EU-TK 7, installed in 1985, capacity: 1,550 gallons of volatile organic compounds.
- (u) One (1) product storage tank, known as EU-TK 8, installed in 1985, capacity: 1,550 gallons of volatile organic compounds.
- (v) One (1) product storage tank, known as EU-TK 9, installed in 1990, capacity: 1,800 gallons of volatile organic compounds.
- (w) One (1) product storage tank, known as EU-TK 10, installed in 1990, capacity: 6,500 gallons of volatile organic compounds.
- (x) One (1) product storage tank, known as EU-TK 11, installed in 1990, capacity: 3,000 gallons of volatile organic compounds.
- (y) One (1) product storage tank, known as EU-TK 12, installed in 1990, capacity: 6,500 gallons of volatile organic compounds.
- (z) One (1) product storage tank, known as EU-TK 13, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (aa) One (1) product storage tank, known as EU-TK 14, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (bb) One (1) product storage tank, known as EU-TK 15, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (cc) One (1) product storage tank, known as EU-TK 16, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (dd) One (1) product storage tank, known as EU-TK 17, installed in 1991, capacity: 6,500 gallons of volatile organic compounds.
- (ee) One (1) product storage tank, known as EU-TK 30, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (ff) One (1) product storage tank, known as EU-TK 31, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (gg) One (1) product storage tank, known as EU-TK 32, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (hh) One (1) product storage tank, known as EU-TK 33, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (ii) One (1) product storage tank, known as EU-TK 34, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (jj) One (1) product storage tank, known as EU-TK 35, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (kk) One (1) product storage tank, known as EU-TK 36, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (ll) One (1) product storage tank, known as EU-TK 37, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.

- (mm) One (1) product storage tank, known as EU-TK 38, installed in 1983, capacity: 10,000 gallons of spent volatile organic compound waste.
- (nn) One (1) product storage tank, known as EU-TK 39, installed in 1983, vented to a catalytic thermal oxidizer, capacity: 12,000 gallons of spent volatile organic compound waste and still bottoms.
- (oo) One (1) product storage tank, known as EU-TK 40, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (pp) One (1) product storage tank, known as EU-TK 41, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (qq) One (1) product storage tank, known as EU-TK 42, installed in 1994, capacity: 5,100 gallons of process water.
- (rr) One (1) product storage tank, known as EU-TK 50, installed in 1983, capacity: 6,900 gallons of waste volatile organic compounds.
- (ss) One (1) product storage tank, known as EU-TK 51, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,800 gallons of volatile organic compounds and distillation heels.
- (tt) One (1) product storage tank, known as EU-TK 52, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (uu) One (1) product storage tank, known as EU-TK 53, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (vv) One (1) over pressurization temporary accumulation vessel, known as EU-V 61, equipped to the catalytic thermal oxidizer, installed in 1997, capacity: 165 gallons.
- (ww) Small pilot solvent recycling unit, known as EU-SP, catalytic thermal oxidizer, with batch capacity: 165 gallons.
- (xx) One (1) solid dispersion unit, known as EU-SD 1, consisting of one (1) 250 gallon tub and one (1) dispenser, exhausted through Stacks SD 1 and FI 1, vented to a catalytic thermal oxidizer, throughput capacity: 19,200 gallons per day.

#### **New Emission Units and Pollution Control Equipment Requiring ENSR**

- (yy) One (1) natural gas-fired fire tube boiler, rated at 8.4 million British thermal units per hour, to be installed in 1998, exhausted through Stack S 2 (insignificant activity).

This new boiler will replace the existing natural gas-fired insignificant boiler rated at 2.1 million British thermal units per hour. The three (3) product storage tanks, known as EU-TK 23, EU-TK 24 and EU-TK 25 are being permitted under CP 041-9839-00015 to be issued in 1998.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

- (b) Combustion source flame safety purging on startup.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (f) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38 degrees Celsius (100 degrees Fahrenheit) or;
  - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (h) Closed loop heating and cooling systems.
- (i) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (j) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.

- (k) Noncontact cooling tower systems with either of the following:
  - (1) Natural draft cooling towers not regulated under a NESHAP.
  - (2) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (l) Heat exchanger cleaning and repair.
- (m) Process vessel degassing and cleaning to prepare for internal repairs.
- (n) Paved and unpaved roads and parking lots with public access.
- (o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (q) On-site fire and emergency response training approved by the department.
- (r) Filter or coalescer media changeout.
- (s) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (t) Activities or categories of activities with individual HAP emissions not previously identified. Any unit emitting greater than one (1) pound per day but less than five (5) pounds per day and one (1) ton per year of a single HAP.
  - (1) Testing or evaluation of alternate separation process or equipment and vessel cleaning methods, procedures, materials, systems and operations.
  - (2) A unit operation for the resuspension and particle sizing of solids received as a part of incoming spent solvents.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following: list permits, registrations, modifications, exemptions, etc.

- (a) Registration Status Letter, issued May 27, 1981,
- (b) IND 000780403, RCRA Part B, issued on 1990, renewed 1996,
- (c) CP 041-9017-00015, issued on November 6, 1997, and
- (d) CP 041-9839-00015 to be issued in 1998.

All conditions from previous approvals were incorporated into this Part 70 permit.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on September 27, 1996. Additional information was received on July 27, 1998, August 11, 1998 and September 11, 1998.

A notice of completeness letter was mailed to the source on October 29, 1996.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations, our summary and the boiler emission calculations are provided in pages 1 to 15 of 15 of Appendix A of this document.

### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	1.51
PM <sub>10</sub>	1.51
SO <sub>2</sub>	0.066
VOC	123
CO	3.85
NO <sub>x</sub>	15.4

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

HAPS	Potential Emissions (tons/year)
Worst Case Single and Combined HAP Methylene Chloride	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPS is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

#### **Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1997 applicant supplied estimates.

Pollutant	Actual Emissions (tons/year)
PM	0.192
PM <sub>10</sub>	0.192
SO <sub>2</sub>	0.008
VOC	9.81
CO	0.491
NO <sub>x</sub>	1.97
Hexane	0.004
Methanol	0.113
MEK	1.68
MIBK	0.305
Styrene	0.071
Toluene	0.977
Xylene	0.410
Glycol Ethers	0.171

#### Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPS
Boiler (EU-BO 1)	1.51	1.51	0.066	0.308	3.85	15.4	0.00
Processes/Recycling	0.000	0.000	0.000	58.9	0.000	0.000	106
Insignificant Activities	2	2	1	1	1	3	0.5
Total Emissions	3.51	3.51	1.07	60.2	4.85	18.4	107

### County Attainment Status

The source is located in Fayette County.

Pollutant	Status
TSP	attainment
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Fayette County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) The only storage tank with a capacity greater than forty (40) cubic meters (10,567 gallons) is EU-TK 39. EU-TK 39 with a capacity of 12,000 gallons, constructed in 1983, is not subject to the requirements of the New Source Performance Standard, Subpart Ka, 326 IAC 12, (40 CFR 60.110a) since the capacity is less than the 40,000 gallon applicability level. Since all other storage tanks have capacities less than 40 cubic meters, those constructed after July 23, 1984 are exempt from the New Source Performance Standard, Subpart Kb, 326 IAC 12, (40 CFR 60.110b) since their capacities are less than the 40 cubic meter applicability level.
- (b) The 25.11 million British thermal units per hour natural gas boiler, known as EU-B0 1, installed in 1981 is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) since it was installed prior to the applicability date of June 9, 1989.
- (c) The new insignificant activity natural gas-fired boiler, rated at 8.4 million British thermal units per hour, known as EU-B0 2, to be installed in 1998 is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) since the heat input is less than the 10.0 million British thermal units per hour threshold level.
- (d) The Standards of Performance from Synthetic Organic Chemical Manufacturing Industry (SOCMI) NSPS Subparts VV for Equipment Leaks, NNN for Distillations Operations and RRR for Reactor Processes for Volatile Organic Compound Emissions do not apply to the recycling industry, since this industry is not a manufacturer of chemicals. Specifically, the source is not subject to NSPS Subpart VV, 40 CFR 60.480 - 60-489 because the source does not manufacture any the materials listed in 40 CFR 60.489. In addition, the source is not subject to NSPS Subpart NNN, 40 CFR 60.660 - 60-668, since the source does not produce any of the materials listed in 40 CFR 60.667. Furthermore, the source is not subject to NSPS Subpart RRR, 40 CFR 60.700 - 60-708, since the source does not produce any of the materials listed in 40 CFR 60.707.

- (e) The source is not subject to either NSPS Subparts JJ or GGG [40 CFR 60.100 - 60.109 or 40 CFR 60.590 - 60.593], since this source is not a petroleum refinery defined as a facility engaged in the production of gasoline, kerosene, distillate fuel oils, residual fuel oils, lubricants, or other products through the distillation of petroleum or through redistillation, cracking, or reforming of unfinished petroleum derivatives.
- (f) The degreasing operation, deemed an insignificant activity, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T (40 CFR 63.460-469) since no halogenated HAP solvents are used.
- (g) The one (1) vacuum distillation unit, known as EU-VD 1, consisting one (1) vacuum pot, one (1) vacuum column, and one(1) vacuum condenser, equipped with a 600 gallon distillate receiver, known as EU-TK 22, equipped with a catalytic thermal oxidizer, installed in 1997, exhausted through Stacks VD 1 and FI 1, is subject to the requirements under Resources Conservation Recovery Act (RCRA) Subparts AA 40 CFR 264 pursuant to CP 041-9017-00015 issued on November 6, 1997.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

This source is a minor source pursuant to this rule since no criteria pollutant is emitted at a rate greater than 250 tons per year. Furthermore this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds in Fayette County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

##### **326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-2-3 (Particulate emission limitations for sources of indirect heating)

Pursuant to 326 IAC 6-2-3 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the natural gas-fired boiler, EU-B 01, constructed in 1981, was in existence before September 21, 1983, and thus shall be limited by the following equation:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}} \quad Pt = \text{lbs of PM emitted per MMBtu heat input}$$

C = maximum ground level concentration (default = 50  $\mu\text{g}/\text{m}^3$ )

a = plume rise factor (default = 0.67 for Q less than 1,000 MMBtu/hr)

h = stack height in feet

Q = total source maximum operating capacity

N = number of stacks in fuel burning operation

$$Pt = \frac{50 \mu\text{g}/\text{m}^3 * 0.67 * 25}{76.5 * 25.11^{0.75} * 1^{0.25}} = 0.976 \text{ pounds of particulate matter emitted per MMBtu heat input}$$

Pursuant to 326 IAC 6-2-3 (e), particulate emissions from all facilities used for indirect heating purposes which began operations after June 8, 1972, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

As shown in the spreadsheet for the boiler combustion, the PM emissions from the boiler is 1.51 tons per year for the 25.11 million British thermal units per hour boiler. This is equivalent to 0.345 pounds per hour of particulate matter per 25.11 million British thermal units heat input or 0.014 pounds per million British thermal unit. Therefore, the boiler complies with the rule.

#### 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(c))

The insignificant activity natural gas-fired boiler, rated at 8.4 million British thermal units per hour boiler is subject 326 IAC 6-4. Pursuant to 326 IAC 6-2-4, the particulate matter (PM) emissions shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where Pt = pounds of particulate matter per million British thermal units heat input, and  
Q = total source maximum operating capacity (million British thermal units per hour)

$$Pt = 1.09/(33.51)^{0.26} = 0.437 \text{ pounds per million British thermal units}$$

As shown in the spreadsheet for the boiler combustion, the PM emissions from the boiler is 0.442 tons per year for the 8.4 million British thermal units per hour boiler. This is equivalent to 0.101 pounds per hour of particulate matter per 8.4 million British thermal units heat input or 0.012 pounds per million British thermal units. Therefore, the boiler complies with the rule.

326 IAC 8-1-6 (New facilities; general reduction requirements)

Since the source, constructed after January 1, 1980, has potential VOC emissions that exceed twenty-five (25) tons per year, and no other Article 8 Rule applies, 326 IAC 8-1-6 is applicable to this source. The as-installed catalytic thermal oxidizer combined with an overall processing/recycling VOC emission limit of 58.9 tons per year is the Best Available Control Technology.

326 IAC 8-4 (Petroleum Source)

This rule does not apply because this source does not recycle or handle petroleum products.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Since all facilities at this source commenced operation after the applicability period of October 7, 1974 through December 31, 1979, this rule is not applicable.

326 IAC 8-9 (Volatile Organic Liquid Vessels)

This rule does not apply to the VOL storage vessels at this Fayette County source since it is not located in Clark, Floyd, Lake or Porter Counties.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The catalytic thermal oxidizer has applicable compliance monitoring conditions as specified below:

The Permittee shall record the exhaust temperature of the catalytic thermal oxidizer, at least once daily when the vacuum distillation unit (EU-VD 1), the fractionation columns (EU-Col 1 and EU-Col 2), vacuum pump (EU-VP 1), pot still 1 (EU-DP 1), and thin film evaporators No. 1 and 2 (EU-TF 1 and EU-TF-2) are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the exhaust temperature shall be maintained at a minimum operating temperature of 650 degrees Fahrenheit or a temperature range determined by the latest stack test to maintain at least 90 percent destruction of VOC captured. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the temperature reading is outside of the specified temperature or range of temperatures for any one reading.

These monitoring conditions are necessary because the thermal oxidizer must operate properly to ensure compliance with 326 IAC 8-1-6, 326 IAC 2-7 (Part 70) and is required by Resources Conservation Recovery Act (RCRA) Subpart AA 40 CFR 264 pursuant to CP 041-9017-00015 issued on November 6, 1997.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations on pages 1 and 3 through 15 of 15 of Appendix A.

### **Conclusion**

The operation of this chemical recycling source shall be subject to the conditions of the attached proposed Part 70 Permit No. T 041-6719-00015.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Part 70 Operating Permit

<b>Source Name:</b>	<b>Reclaimed Energy Company, Inc.</b>
<b>Source Location:</b>	<b>1500 Western Avenue, Connersville, Indiana 47331</b>
<b>County:</b>	<b>Fayette</b>
<b>SIC Code:</b>	<b>7389, 7398, 7299, 2869</b>
<b>Operation Permit No.:</b>	<b>T 041-6719-00015</b>
<b>Permit Reviewer:</b>	<b>Mark L. Kramer</b>

On October 12, 1988, the Office of Air Management (OAM) had a notice published in the News Examiner, Connersville, Indiana, stating that Reclaimed Energy Company, Inc. had applied for a Part 70 Operating Permit to operate a chemical recycling source with control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On November 10, 1998, Ron Synder of Reclaimed Energy, submitted comments on the proposed Part 70 Operating Permit. The comments and IDEM's responses follow. Deleted language in the permit appears as ~~strikeouts~~ and new language is **bolded**.

#### FACILITY OPERATION CONDITIONS

##### **Comment 1:**

##### SECTION D.1, FACILITY DESCRIPTIONS

The 24-hour rate on Thin Film Evaporator #1 in paragraph (j) should equal that of Thin Film Evaporator #2 in paragraph (k). Paragraph (j) should read in part . . . "throughput capacity: 14,400 gallons of solvent per twenty-four (24) hour period."

##### **Response 1:**

The typographical error has been corrected in Sections A.2 and D.1 as follows:

- (j) One (1) thin film evaporator No.1, known as EU-TF 1, equipped with a 450 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 1 and FI 1, installed in 1984, throughput capacity: **14,400** ~~1,440~~ gallons of solvent per twenty-four (24) hour period.

##### **Comment 2:**

##### SECTION D.1.7 RECORD KEEPING REQUIREMENTS

A typographical error exists in paragraph (b). It should read in part . . . "Permittee shall maintain records of the daily exhaust temperature " . . . (removing the word "in").

##### **Response 2:**

The typographical error has been corrected as suggested in Condition D.1.7(b) as follows:

- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records ~~in~~ of the daily exhaust temperature or indicate that none of the facilities listed in Condition D.1.1 were in operation.

**Comment 3:**

SECTION D.3 FACILITY DESCRIPTIONS

The tanks referred to in paragraphs (b), (c), and (d) were installed shortly after August 5, 1998 under Permit Registration Number CP041-4839-00015. The words "to be" should be removed from all three lines.

**Response 3:**

The tank installation dates have been specified as 1998 in Sections A.2 and D.3 as follows:

- (b) One (1) product storage tank, known as EU-TK 23, ~~to be~~ installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (c) One (1) product storage tank, known as EU-TK 24, ~~to be~~ installed in 1998, capacity: 2,000 gallons of volatile organic compounds.
- (d) One (1) product storage tank, known as EU-TK 25, ~~to be~~ installed in 1998, capacity: 2,000 gallons of volatile organic compounds.

**Comment 4:**

The product storage tank referred to as EU-TK 42 in paragraph (qq) was installed in 1984 instead of 1994.

**Response 4:**

The product storage tank installation date has been changed to 1984 in Sections A.2 and D.3 as follows and no changes in the applicable rules occur because of this change:

- (qq) One (1) product storage tank, known as EU-TK 42, installed in **1984** ~~1994~~, capacity: 5,100 gallons of process water.

**Comment 5:**

The product storage tank referred to as EU-TK 50 in paragraph (rr) was installed in 1992 instead of 1983.

**Response 5:**

The product storage tank installation date has been changed to 1992 in Sections A.2 and D.3 as follows and no changes in the applicable rules occur because of this change:

- (rr) One (1) product storage tank, known as EU-TK 50, installed in **1992** ~~1983~~, capacity: 6,900 gallons of waste volatile organic compounds.

**Comment 6:**

A typographical error exists in paragraph (vv). The word "equipped" should be replaced with "attached". Paragraph (vv) should read in part . . . "EU-V61, attached to the catalytic thermal oxidizer," . . .

**Response 6:**

Part (vv) in Section A.2 and D.3 have been revised as follows:

- (vv) One (1) over pressurization temporary accumulation vessel, known as EU-V 61, **attached** ~~equipped~~ to the catalytic thermal oxidizer, installed in 1997, capacity: 165 gallons.

**Comment 7:**

**SECTION D.3.6 RECORD KEEPING REQUIREMENTS**

A typographical error exists in paragraph (b). The word "in" should be removed. Paragraph (b) should read in part . . . "Permittee shall maintain records of the daily exhaust temperature or indicate" . . .

**Response 7:**

The typographical error has been corrected as suggested in Condition D.3.6(b) as follows:

- (b) To document compliance with Condition D.3.32, the Permittee shall maintain records ~~in~~ of the daily exhaust temperature or indicate that none of the facilities listed in Condition D.3.24 (b) were in operation.

**Comment 8:**

**SECTION D.5 FACILITY DESCRIPTION, INSIGNIFICANT ACTIVITIES**

RECI has a dip tank used to maintain clean surfaces on our heat exchangers. The exchangers transfer energy from source steam to the solvent. Please find the attached information about the process. N-methyl-2-pyrrolidone is used to clean the heaters. Details of the process are attached. We believe that process still falls under insignificant emissions.

**Response 8:**

This dip tank qualifies as an insignificant degreasing activity which is already specified in the list of insignificant activities in part (b) of Condition A.3. Therefore, no changes to the permit are necessary.

**TECHNICAL SUPPORT DOCUMENT**

**Comments 9 - 12**

**UNPERMITTED EMISSION UNITS**

The 24-hour rate on Thin Film Evaporator #1 in paragraph (j) should equal that of Thin Film Evaporator #2 in paragraph (k). Paragraph (j) should read in part . . . "throughput capacity: 14,400 gallons of solvent per twenty-four (24) hour period."

The product storage tank referred to as EU-TK 42 in paragraph (qq) was installed in 1984 instead of 1994.

The product storage tank referred to as EU-TK 50 in paragraph (rr) was installed in 1992 instead of 1983.

RECI has a dip tank used to maintain clean surfaces on our heat exchangers. The exchangers transfer energy from source steam to the solvent. Please find the attached information about the process. N-methyl-2-pyrrolidone is used to clean the heaters. Details of the process are attached. We believe that process still falls under insignificant emissions.

## **Responses 9 - 12**

The aforementioned equipment list changes and an additional insignificant activity have been addressed in Responses 1, 4, 5 and 8 above. The Technical Support Document is not revised and these changes have been duly noted in this Addendum and in the Permit.

### GENERAL COMMENTS

40 CFR SUBPART DD-NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANT FROM OFF-SITE WASTE AND RECOVERY OPERATIONS (Off-site Recovery NESHAP.)

#### **Comment 13:**

Off-Site Recovery NESHAP (40 CFR 63 Subpart DD) and RCRA TSD Air Regulations, Subparts AA, BB and CC (40 CFR 264.1033, 264.1055, and 264.1080) both apply to RECI's waste storage tanks, equipment and process vents but not product storage Tanks 1 through 17.

The RCRA TSD Air Regulations, Subparts AA - Process Vents, BB - Equipment Leaks, and CC - Tanks, Surface Impoundments and Containers parallel the Off-Site Recovery NESHAP. RECI's pollution control system was designed to operate within the RCRA TSD Air rules. RCRA Air Regulation compliance constitutes the NESHAP requirements. Reclaimed Energy submitted a copy of the applicable RCRA TSD Air Regulations as supporting information.

#### **Response 13:**

The RCRA air rules have been amended with provisions that indicate if equipment is operating air emission controls in compliance with the applicable Clean Air Act standard (i.e., 40 CFR 63, Subpart DD) that the equipment can be deemed in compliance with the RCRA rules 40 CFR Part 264 and 265, Subparts AA, BB, and CC (refer to 40 CFR 265.1080(b)(7), 265.1064(m), 265.1030(d) and the parallel provisions in Part 264). However, the NESHAP does not have a similar reverse statement; therefore, Reclaimed Energy must demonstrate compliance with the NESHAP provisions.

Although the source is already subject to the TSD Air Regulations in 40 CFR 264 Subparts AA (Process Vents), BB (Equipment Leaks), and CC (Tank and Container) regulations, Section D.6 has been added to the proposed Part 70 Permit to specifically address the requirements of Subpart DD, Subpart OO (National Emission Standards for Tanks - Level 1) and Subpart PP (National Emission Standards for Containers) as follows. A cross-reference to Section D.6 has been added as Conditions D.1.1 and D.3.1 and the remaining conditions of Sections D.1 and D.3 have been renumbered.

#### **D.1.1 NESHAP [326 IAC 20-23-1] [40 CFR Part 63]**

**EU-VD 1, EU-Col 1, EU-Col 2, EU-VP1, EU-DP 1, EU-TF 1, EU-TF 2 and EU-FI 1 are subject to 40 CFR Part 63 as specified in Section D.6.**

**D.3.1 NESHAP [326 IAC 20-23-1] [40 CFR Part 63]**

EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 41, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, EU-TK 53, EU-V 61 and EU-SD 1 are subject to 40 CFR Part 63 as specified in Section D.6.

**SECTION D.6 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]**

- (a) One (1) vacuum distillation unit, known as EU-VD 1, rated at 1.7 million British thermal units per hour, consisting of one (1) vacuum pot, one (1) vacuum column, and one(1) vacuum condenser, equipped with a 600 gallon distillate receiver, known as EU-TK 22, equipped with a catalytic thermal oxidizer, installed in 1997, exhausted through Stacks VD 1 and FI 1, capacity: 9,600 gallons per 24 hours, holding capacity: 3,300 gallons of solvent.
- (f) One (1) fractionation column No.1, known as EU-Col 1, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK18, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1983, exhausted through Stacks CV 1 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (g) One (1) fractionation column No.2, known as EU-Col 2, rated at 0.522 million British thermal units per hour, attached to 275 gallon distillate receiver, known as EU-TK19, equipped with a catalytic thermal oxidizer, known as FI 1, installed in 1984, exhausted through Stacks CV 2 and FI 1, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (h) One (1) vacuum pump, known as EU-VP 1, rated at 275 cubic feet per minute peak, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks VP 1 and FI 1, installed in 1994.
- (i) One (1) pot still1, known as EU-DP 1, attached to 275 gallon distillate receiver, known as EU-TK20, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stack DP 1 and FI 1, installed in 1992, throughput capacity: 9,600 gallons of solvent per 24 hours, holding capacity: 3,300 gallons of solvent per batch.
- (j) One (1) thin film evaporator No.1, known as EU-TF 1, equipped with a 450 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 1 and FI 1, installed in 1984, throughput capacity: 14,400 gallons of solvent per twenty-four (24) hour period.
- (k) One (1) thin film evaporator No.2, known as EU-TF 2, equipped with a 350 gallon day tank, equipped with a catalytic thermal oxidizer, known as FI 1, exhausted through Stacks TF 2 and FI 1, installed in 1990, throughput capacity: 14,400 gallons of solvent per 24 hours.
- (m) One (1) natural gas-fired fume incinerator (catalytic thermal oxidizer), known as FI 1, rated at 1.5 million British thermal units per hour, installed December 1997, exhausted through Stack FI 1, exhaust rate: 2,500 cubic feet per minute.
- (ee) One (1) product storage tank, known as EU-TK 30, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (ff) One (1) product storage tank, known as EU-TK 31, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.
- (gg) One (1) product storage tank, known as EU-TK 32, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.

**Facility Description [326 IAC 2-7-5(15)] (continued)**

- (hh) One (1) product storage tank, known as EU-TK 33, installed in 1983, capacity: 6,900 gallons of spent volatile organic compound waste.**
- (ii) One (1) product storage tank, known as EU-TK 34, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.**
- (jj) One (1) product storage tank, known as EU-TK 35, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.**
- (kk) One (1) product storage tank, known as EU-TK 36, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.**
- (ll) One (1) product storage tank, known as EU-TK 37, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.**
- (mm) One (1) product storage tank, known as EU-TK 38, installed in 1983, capacity: 10,000 gallons of spent volatile organic compound waste.**
- (nn) One (1) product storage tank, known as EU-TK 39, installed in 1983, vented to a catalytic thermal oxidizer, capacity: 12,000 gallons of spent volatile organic compound waste and still bottoms.**
- (oo) One (1) product storage tank, known as EU-TK 40, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.**
- (pp) One (1) product storage tank, known as EU-TK 41, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.**
- (qq) One (1) product storage tank, known as EU-TK 42, installed in 1984, capacity: 5,100 gallons of process water.**
- (rr) One (1) product storage tank, known as EU-TK 50, installed in 1992, capacity: 6,900 gallons of waste volatile organic compounds.**
- (ss) One (1) product storage tank, known as EU-TK 51, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,800 gallons of volatile organic compounds and distillation heels.**
- (tt) One (1) product storage tank, known as EU-TK 52, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.**
- (uu) One (1) product storage tank, known as EU-TK 53, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.**
- (vv) One (1) over pressurization temporary accumulation vessel, known as EU-V 61, attached to the catalytic thermal oxidizer, installed in 1997, capacity: 165 gallons.**
- (xx) One (1) solid dispersion unit, known as EU-SD 1, consisting of one (1) 250 gallon tub and one (1) dispenser, exhausted through Stacks SD 1 and FI 1, vented to a catalytic thermal oxidizer, throughput capacity: 19,200 gallons per day.**

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

## **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

### **D.6.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]**

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart DD, Table 2.

### **D.6.2 Off-site Waste and Recovery Operations NESHAP [326 IAC 20-23-1] [40 CFR Part 63, Subpart DD]**

These facilities are subject to 40 CFR Part 63, Subpart DD, which is incorporated by reference as 326 IAC 20-23-1, with a compliance date of February 1, 2000. A copy of this rule is attached.

(a) Pursuant to 40 CFR 63.683(b)(1)(i), the Permittee shall control the air emissions from each affected off-site material management unit (EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, EU-TK 53, EU-SD 1) in accordance with the provisions listed below and 40 CFR 63.685 through 63.689:

(1) The Permittee shall control air emissions from tanks EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, and EU-TK 53 in accordance with the applicable standards specified in 40 CFR 63.685(b).

(A) Pursuant to 40 CFR 63.685(b)(1) and 40 CFR 63.685(c), the Permittee shall meet the following requirements for tanks EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 42, and EU-TK 50, using Tank Level 1 controls:

(i) The Permittee shall determine the maximum hazardous air pollutant (HAP) vapor pressure for an off-site material to be managed in each tank using Tank Level 1 controls before the first time the off-site material is placed in the tank, in accordance with 40 CFR 63.694(j) and Condition D.6.9(a). Thereafter, the Permittee shall perform a new determination whenever changes to the off-site material managed in the tank could potentially cause the maximum HAP vapor pressure to increase to a level that is equal to or greater than the maximum HAP vapor pressure limit for the tank design capacity category specified in Table 3 or Table 4 of 40 CFR 63, Subpart DD, as applicable to each tank; and,

(ii) The Permittee shall control air emissions from each tank in accordance with the provisions specified in 40 CFR 63, Subpart DD--National Emission Standards for Tanks--Level 1, and Condition D.6.3.

(B) Pursuant to 40 CFR 63.685(b)(4)(i), the Permittee shall control air emissions from tanks EU-TK39, EU-TK51, EU-TK52, EU-TK53 by venting each tank through a closed-vent system to the catalytic thermal oxidizer, FI 1, in accordance with the requirements specified in 40 CFR 63.685(g) and Condition D.6.4.

- (2) Pursuant to 40 CFR 63.688(b)(3)(i), the Permittee shall control air emissions from container EU-SD 1 in accordance with the standards for Container Level 2 controls, as specified in 40 CFR 63, Subpart PP - National Emission Standards for Containers, and Condition D.6.5.
  - (3) Pursuant to 40 CFR 63.689(c)(2), for each transfer system, the Permittee shall control air emissions by operating a transfer system that consists of continuous hard-piping. All joints or seams between the pipe sections shall be permanently or semi-permanently sealed (e.g., a welded joint between two sections of metal pipe or a bolted and gasketed flange).
- (b) Pursuant to 40 CFR 63.683(c)(1)(i), the Permittee shall control the air emissions from process vents EU-VD 1/EU-TK 22, EU-Col1/EU-TK 18, EU-Col2/EU-TK 19, EU-VP 1, EU-DP 1/EU-TK 20, EU-TF 1, EU-TF 2, FI 1, EU-TK 40, EU-TK 41, and EU-V 61 in accordance with the standards specified in 40 CFR 63.690. Pursuant to 40 CFR 63.690, the Permittee shall route the vent stream from each process vent through a closed-vent system to the catalytic thermal oxidizer, FI 1, that meets the standards specified in 40 CFR 63.693 and Condition D.6.6.
- (c) Pursuant to 40 CFR 63.683(d), the Permittee shall control equipment leaks from each equipment component that is part of the affected source specified in 40 CFR 63.680 (c)(3) by implementing leak detection and control measures in accordance with the standards specified in 40 CFR 63.691(b) and Condition D.6.7.

**D.6.3 National Emission Standards for Tanks - Level 1 [326 IAC 20-23-1] [40 CFR Part 63, Subpart OO]**

The provisions of Subpart OO – National Emission Standards for Tanks – Level 1 apply to the control of air emissions from tanks EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 42, and EU-TK 50, subject to 40 CFR 63.685(c) and Condition D.6.2(a)(1)(A).

- (a) Pursuant to 40 CFR 63.902(b), each tank shall be equipped with a fixed roof designed to meet the following specifications:
  - (1) The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface area of the liquid in the tank. The fixed roof may be a separate cover installed on the tank (e.g., a removable cover mounted on an open-top tank) or may be an integral part of the tank structural design (e.g., a horizontal cylindrical tank equipped with a hatch).
  - (2) The fixed roof shall be installed in a manner such that there are no visible cracks, holes, gaps, or other open spaces between roof section joints or between the interface of the roof edge and the tank wall.
  - (3) Each opening in the fixed roof, and any manifold system associated with the fixed roof, shall be either:
    - (A) Equipped with a closure device designed to operate such that when the closure device is secured in the closed position there are no visible cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the opening and the closure device; or,

- (B) Connected by a closed-vent system that is vented to a control device. The control device shall remove or destroy organics in the vent stream, and shall be operating whenever regulated material is managed in the tank.
  - (4) The fixed roof and its closure devices shall be made of suitable materials that will minimize exposure of the regulated-material to the atmosphere, to the extent practical, and will maintain the integrity of the equipment throughout its intended service life, according to the provisions of 40 CFR 63.902(b)(4).
- (b) Pursuant to 40 CFR 63.902(c), whenever regulated material is in each tank, each fixed roof shall be installed with each closure device secured in the closed position, except as follows:
- (1) Opening of closure devices or removal of the fixed roof is allowed at the following times:
    - (A) To provide access to the tank for performing routine inspection, maintenance, or other activities needed for normal operations. Examples of such activities include those times when a worker needs to open a port to sample the liquid in the tank, or when a worker needs to open a hatch to maintain or repair equipment. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable, to the tank; and,
    - (B) To remove accumulated sludge or other residues from the bottom of tank.
  - (2) Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the tank internal pressure in accordance with the tank design specifications. The device shall be designed to operate with no detectable organic emissions, as determined by Condition D.6.9(b), when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever the tank internal pressure is within the internal pressure operating range determined by the Permittee based on the tank manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, combustible, explosive, reactive, or hazardous materials. Examples of normal operating conditions that may require these devices to open are during those times when the container internal pressure exceeds the internal pressure operating range for the tank as a result of loading operations or diurnal ambient temperature fluctuations.
  - (3) Opening of a safety device, as defined in 40 CFR 63.901, is allowed at any time conditions require it to do so to avoid an unsafe condition.

**D.6.4 Requirements for Tanks with Maximum Organic Vapor Pressure Equal to or Greater than 76.6 kPa [326 IAC 20-23-1] [40 CFR 63.685(g)]**

The provisions of 40 CFR 63.685(g) apply to the control of air emissions from tanks which are controlled by venting to a control device. The Permittee shall meet the requirements specified in items (a) and (b) below.

- (a) Pursuant to 40 CFR 63.685(g)(1), each tank shall be covered by a fixed roof and vented directly through a closed-vent system to the catalytic thermal oxidizer in accordance with items (1) through (4) below.
  - (1) The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface area of the liquid in the tank.
  - (2) Each opening in the fixed roof not vented to the catalytic thermal oxidizer shall be equipped with a closure device. The closure device shall be designed to operate with no detectable organic emissions in accordance with 40 CFR 63.694(k) and Condition D.6.9(c).
  - (3) The fixed roof and its closure devices shall be made of suitable materials that will minimize exposure of the off-site material to the atmosphere, to the extent practical, and will maintain the integrity of the equipment throughout its intended service life. Factors to be considered when selecting the materials for and designing the fixed roof and closure devices shall include: organic vapor permeability; the effects of any contact with the liquid and its vapor managed in the tank; the effects of outdoor exposure to wind, moisture, and sunlight; and the operating practices used for the tank on which the fixed roof is installed.
  - (4) The closed-vent system and catalytic thermal oxidizer shall be designed and operated in accordance with the requirements of 40 CFR 63.693 and Condition D.6.6.
- (b) Pursuant to 40 CFR 63.685(g)(2), whenever an off-site material is in the tank, the fixed roof shall be installed with each closure device secured in the closed position and the vapor headspace underneath the fixed roof vented to the catalytic thermal oxidizer except as provided in items (1) and (2) below.
  - (1) Venting to the control device is not required, and opening of closure devices or removal of the fixed roof is allowed at the following times:
    - (A) To provide access to the tank for performing routine inspection, maintenance, or other activities needed for normal operations. Examples of such activities include those times when a worker needs to open a port to sample liquid in the tank, or when a worker needs to open a hatch to maintain or repair equipment. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable, to the tank; and,
    - (B) To remove accumulated sludge or other residues from the bottom of the tank.

- (2) Opening of a safety device, as defined in 40 CFR 63.681, is allowed at any time conditions require it to do so to avoid an unsafe condition.

**D.6.5 National Emission Standards for Containers [326 IAC 20-23-1] [40 CFR Part 63, Subpart PP]**

The provisions of 40 CFR 63, Subpart PP – National Emission Standards for Containers, apply to the control of air emissions from containers subject to 40 CFR 63.688(b)(3) and Condition D.6.2(a)(2). The container EU-SD 1 shall be vented to the closed-vent system and to the catalytic thermal oxidizer meeting the requirements described in Condition D.6.6.

- (a) Pursuant to 40 CFR 63.688(b)(3), the Permittee shall control air emissions from the container, EU-SD 1, in accordance with Container Level 2 controls as specified in 40 CFR 63, Subpart PP.
- (b) Pursuant to 40 CFR 63.923(c), transfer of regulated material in to or out of the container shall be conducted in such a manner as to minimize exposure of the regulated material to the atmosphere, to the extent practical, considering the physical properties of the regulated material and good engineering and safety practices for handling flammable, ignitable, explosive, or other hazardous materials. Examples of container loading procedures that meet the requirements of this paragraph include using any one of the following: a submerged-fill pipe or other submerged-fill method to load liquids into the container; a vapor-balancing system or a vapor-recovery system to collect and control the vapors displaced from the container during filling operations; or a fitted opening in the top of a container through which the regulated material is filled, with subsequent purging of the transfer line before removing it from the container opening.
- (c) Pursuant to 40 CFR 63.923(d), whenever a regulated material is in the container, the Permittee shall install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except as provided in 40 CFR 63.923(d) and in (1) through (5) below.
  - (1) Opening of a closure device or cover is allowed for the purpose of adding material to the container as follows:
    - (A) In the case when the container is filled to the intended final level in one continuous operation, the Permittee shall promptly secure the closure devices in the closed position and install the covers, as applicable to the container, upon conclusion of the filling operation.
    - (B) In the case when discrete quantities or batches of material intermittently are added to the container over a period of time, the Permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon either the container being filled to the intended final level, the completion of a batch loading after which no additional material will be added to the container within 15 minutes, the person performing the loading operation leaves the immediate vicinity of the container, or the shutdown of the process generating the material being added to the container, whichever condition occurs first.
  - (2) Opening of a closure device or cover is allowed for the purpose of removing material from the container as follows:

- (A) For the purpose of meeting the requirements of this condition, an empty container as defined in 40 CFR 63.921 may be open to the atmosphere at any time (e.g., covers and closure devices are not required to be secured in the closed position on an empty container).
    - (B) In the case when discrete quantities or batches of material are removed from the container but the container does not meet the conditions to be an empty container as defined in 40 CFR 63.921, the Permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the unloading operation leaves the immediate vicinity of the container, whichever condition occurs first.
  - (3) Opening of a closure device or cover is allowed when access inside the container is needed to perform routine activities other than transfer of regulated material. Examples of such activities include those times when a worker needs to open a port to measure the depth of or sample the material in the container, or when a worker needs to open a manhole hatch to access equipment inside the container. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable to the container.
  - (4) Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the container internal pressure in accordance with the container design specifications. The device shall be designed to operate with no detectable organic emissions, as determined by 40 CFR 63.925(a) and Condition D.6.9(c), when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever the container internal pressure is within the internal pressure operating range determined by the Permittee based on container manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, combustible, explosive, reactive, or hazardous materials. Examples of normal operating conditions that may require these devices to open are during those times when the container internal pressure exceeds the internal pressure operating range for the container as a result of loading operations or diurnal ambient temperature fluctuations.
  - (5) Opening of a safety device, as defined in 40 CFR 63.921, is allowed at any time conditions require it to do so to avoid an unsafe condition.
- (d) Pursuant to 40 CFR 63.923(f), for the purpose of compliance with 40 CFR 63.923(b)(1) and Condition D.6.5(a), the container shall meet the applicable U.S. DOT regulations on packaging hazardous materials for transportation as follows:
- (1) The container shall meet the applicable requirements specified in 49 CFR Part 178--Specifications for Packagings or 49 CFR Part 179--Specifications for Tank Cars.

- (2) Regulated-material is managed in the container in accordance with the applicable requirements specified in 49 CFR Part 107, Subpart B-- Exemptions; 49 CFR Part 172--Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements; 49 CFR Part 173--Shippers--General Requirements for Shipments and Packaging; and 49 CFR Part 180--Continuing Qualification and Maintenance of Packagings.
- (3) For the purpose of complying with this condition, no exceptions to the 49 CFR Part 178 or Part 179 regulations are allowed except as provided for in paragraph (d)(4) of this condition.
- (4) For a lab pack that is managed in accordance with the requirements of 49 CFR part 178 for the purpose of complying with this condition, the Permittee may comply with the exceptions for those packagings specified in 49 CFR 173.12(b).

**D.6.6 Standards: Closed Vent Systems and Control Devices [326 IAC 20-23-1] [40 CFR 63.693]**

The provisions of 40 CFR 63.693 apply to the closed-vent system and the catalytic thermal oxidizer, FI 1, used to control air emissions from the tanks, process vents, and containers with conditions that reference this condition and for which 40 CFR 63.685(g), 40 CFR 63.690, or 40 CFR 63.923 applies. The Permittee shall meet the requirements specified in items (a) through (c) below.

- (a) Pursuant to 40 CFR 63.693(b), the Permittee shall meet the following requirements for the closed-vent system and catalytic thermal oxidizer used to comply with this section:
  - (1) The closed-vent system shall meet the requirements specified in 40 CFR 63.693(c) and paragraph (b) of this condition.
  - (2) The catalytic thermal oxidizer shall meet the requirements specified in 40 CFR 63.693(f) and paragraph (c) of this condition.
  - (3) Whenever gases or vapors containing HAP are vented through the closed-vent system connected to the catalytic thermal oxidizer, the catalytic thermal oxidizer shall be operating except at the times listed in either paragraph (a)(3)(A) or (a)(3)(B) of this condition.
    - (A) The catalytic thermal oxidizer may be bypassed for the purpose of performing planned routine maintenance of the closed-vent system or catalytic thermal oxidizer in situations when the routine maintenance cannot be performed during periods that the emission point vented to the catalytic thermal oxidizer is shutdown. On an annual basis, the total time that the closed-vent system or catalytic thermal oxidizer is bypassed to perform routine maintenance shall not exceed 240 hours per each calendar year.
    - (B) The catalytic thermal oxidizer may be bypassed for the purpose of correcting a malfunction of the closed-vent system or catalytic thermal oxidizer. The Permittee shall perform the adjustments or repairs necessary to correct the malfunction as soon as practicable after the malfunction is detected.

- (b) Pursuant to 40 CFR 63.693(c), the vent stream required to be controlled by Conditions D.6.2, D.6.4, and D.6.5 shall be conveyed to the catalytic thermal oxidizer by a closed-vent system that is designed to operate at a pressure below atmospheric pressure.
- (c) Pursuant to 40 CFR 63.693(f), the catalytic thermal oxidizer must achieve the following performance specifications:
  - (1) Pursuant to 40 CFR 63.693(f)(1)(i)(A), destroy the total organic compounds (TOC), less methane and ethane, contained in the vent stream entering the catalytic thermal oxidizer by 95 percent or more, on a weight-basis.
  - (2) Pursuant to 40 CFR 63.693(f)(2), the Permittee must use a design analysis of the catalytic thermal oxidizer to demonstrate compliance with paragraph (1) of this condition. The Permittee must include, as part of the design analysis, the information specified in 40 CFR 63.693(f)(2)(ii)(B) and Condition D.6.10(a).
  - (3) Pursuant to 40 CFR 63.693(f)(3), the Permittee must monitor the operation of the catalytic thermal oxidizer in accordance with 40 CFR 63.695(e) and Condition D.6.14(a).
- (d) The catalytic thermal oxidizer shall maintain the minimum catalyst bed inlet operating temperature and a minimum catalyst bed outlet operating temperature of 650 degrees Fahrenheit (EF) until the minimum catalyst bed inlet and outlet temperatures necessary to maintain a minimum 95% by weight overall destruction of the TOC, less methane and ethane, is determined by the design analysis conducted in accordance with Condition D.6.10. The Permittee shall apply for a minor permit modification to include the minimum catalyst bed inlet and outlet operating temperature values, as determined by the design analysis, upon approval of the design analysis by IDEM, OAM.

**D.6.7 National Emission Standard for Equipment Leaks (Fugitive Emission Sources)[40 CFR 61, Subpart V]**

Pursuant to 40 CFR 63.683(d) and 40 CFR 63.691(b)(1), the Permittee shall control the HAP emitted from equipment leaks in accordance with 40 CFR 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources), Sections 61.242 through 61.247. The provisions apply to each equipment component that is part of the affected source, including components related to EU-VD 1/EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, EU-VP 1, EU-DP 1/EU-TK 20, EU-TF 1, EU-TF 2, FI 1, EU-TK 40, EU-TK 41, EU-V 61 EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, EU-TK 53, and EU-SD 1, that meet the criteria specified in 40 CFR 63.680(c)(3).

- (a) Pursuant to 40 CFR 61.242-1(d), each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.
- (b) Pursuant to 40 CFR 61.242-2 (Standards: Pumps), each pump shall be monitored in accordance with Condition D.6.15(a).

- (c) Pursuant to 40 CFR 61.242-4 (Standards: Pressure relief devices in gas/vapor service), the standards listed below apply to pressure relief devices in gas/vapor service.

  - (1) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 61.245(c).
  - (2) The following requirements apply regarding pressure releases:

    - (A) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 61.242-10 and Condition D.6.15 (e); and,
    - (B) No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored in accordance with Condition D.6.15 (b).
  - (3) Any pressure relief device that is equipped with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device as described in 40 CFR 61.242-11 and paragraph (i) of this condition is exempt from the requirements of paragraphs (c)(1) and (2) of this condition. The four check valves designed to relieve pressure on the following units meet the requirements of this paragraph: EU-VD 1/EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, and EU-DP 1/EU-TK 20.
- (d) Pursuant to 40 CFR 61.242-5 (Standards: Sampling connecting systems), the standards listed below apply to sampling connecting systems.

  - (1) Each sampling connection system shall be equipped with a closed-purge system or closed vent system.
  - (2) Each closed-purge system or closed-vent system as required in paragraph (d)(1) shall:

    - (A) For the sampling systems for the units EU-VD 1/EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, and EU-DP 1/EU-TK 20, return the purged process fluid directly to the process line with zero volatile hazardous air pollutant (VHAP) emissions to the atmosphere; or,
    - (B) For the sampling systems for units EU-TF 1 and EU-TK 2, be designed and operated to capture and transport all the purged process fluid to the closed vent system and catalytic thermal oxidizer, FI 1.
- (e) Pursuant to 40 CFR 61.242-6 (Standards: Open-ended valves or lines), the standards listed below apply to open-ended valves or lines.

- (1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in paragraph (e)(4) of this condition.
  - (2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.
  - (3) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
  - (4) When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with paragraph (e)(1) of this condition at all other times.
- (f) Pursuant to 40 CFR 61.242-7 (Standards: Valves), each valve shall be monitored in accordance with Condition D.6.15(c).
- (g) Pursuant to 40 CFR 61.242-8 (Standards: Pressure relief devices in liquid service and flanges and other connectors), pressure relief devices in liquid service and flanges and other connectors shall be monitored in accordance with Condition D.6.15(d).
- (h) Pursuant to 40 CFR 61.242-9 (Standards: Product accumulator vessels), each product accumulator vessel shall be equipped with a closed-vent system capable of capturing and transporting any leakage from the vessel to the catalytic thermal oxidizer, FI 1.
- (i) Pursuant to 40 CFR 61.242-11 (Standards: Closed-vent systems and control devices), the Permittee shall comply with the provisions of this paragraph for the closed-vent system and catalytic thermal oxidizer.
- (1) The catalytic thermal oxidizer shall be designed and operated to reduce the VHAP emissions vented to it with an efficiency of 95 percent or greater.
  - (2) The Permittee shall monitor the catalytic thermal oxidizer and closed-vent system in accordance with the provisions in Condition D.6.15(f) and (g).
  - (3) Closed-vent systems shall be designed for and operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background and by visual inspections, as determined by the methods specified in 40 CFR 61.245(c).
  - (4) The closed-vent system and catalytic thermal oxidizer shall be operated at all times when emissions may be vented to them.

**D.6.8 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions]**

Pursuant to 40 CFR 63, Subpart DD, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart DD. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. The plan shall be incorporated by reference into the source's Part 70 permit.

- (a) The purpose of the SSM plan is to –
- (1) Ensure that, at all times, the Permittee operates and maintains each facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;
  - (2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and
  - (3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).
- (b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain each facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.
- (c) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAM for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAM, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.
- (d) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAM.
- (e) IDEM, OAM shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAM may require that the Permittee make changes to the SSM plan for the source. IDEM, OAM may require reasonable revisions to a SSM plan, if IDEM, OAM finds that the plan:

- (1) Does not address a startup, shutdown, or malfunction event that has occurred;
- (2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or
- (3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.

- (f) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

#### **Compliance Determination Requirements**

##### **D.6.9 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63]**

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- (a) To determine compliance with 40 CFR 63.685(c), the maximum HAP vapor pressure shall be determined using the procedures specified in 40 CFR 63.694(j) of Subpart DD.
- (b) Pursuant to 40 CFR 63, Subpart OO, the Permittee must demonstrate that no detectable organic emissions result from the pressure relief device described in Condition D.6.3(b)(2) by performing a test in accordance with 40 CFR 63.905.
- (c) The Permittee shall determine no detectable organic emissions for the purpose of complying with Condition D.6.4 and 40 CFR 63, Subpart DD, by following the procedure codified in 40 CFR 63.694(k).
- (d) Pursuant to 40 CFR 63, Subpart PP, the Permittee must demonstrate that no detectable organic emissions result from the pressure relief device described in Condition D.6.5(c)(4) by performing a test in accordance with 40 CFR 63.925(a).
- (e) When equipment is tested for compliance with or monitored for no detectable emissions in accordance with the standard for pressure relief devices in 40 CFR 61.242-4, the Permittee shall comply with the requirements in 40 CFR 61.245(c).
- (f) Pursuant to 40 CFR 61.242-1(b), compliance with 40 CFR 61, Subpart V, will be determined by a review of records, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 61.245.

##### **D.6.10 Catalytic Thermal Oxidizer Compliance Determination Requirements [326 IAC 2-7-6(1)] [40 CFR 63]**

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- (a) Pursuant to 40 CFR 63.693(f)(2), the Permittee shall demonstrate that the catalytic thermal oxidizer achieves the applicable performance requirements in Conditions D.6.6(a) and (c) by performing a design analysis. The design analysis shall be conducted in accordance with 40 CFR 63.693(f)(2)(ii) and the following:
  - (1) The design analysis shall address the vent stream composition, constituent concentrations, and flow rate; and,
  - (2) The design analysis shall establish the design minimum and average temperatures across the catalyst bed inlet and outlet, and the design service life of the catalyst.

- (b) Pursuant to 40 CFR 63.693(c)(8), IDEM, OAM or the United States Environmental Protection Agency (US EPA) Administrator may request that the design analysis be revised or amended by the Permittee to correct any deficiencies identified by IDEM, OAM or the Administrator. If the Permittee and IDEM, OAM or the Administrator do not agree on the acceptability of using the design analysis (including any changes requested by IDEM, OAM or the Administrator) to demonstrate that the catalytic thermal oxidizer achieves the applicable performance requirements, then the disagreement must be resolved using the results of a performance test conducted by the Permittee in accordance with the requirements of 40 CFR 63.694(l).
- (1) IDEM, OAM or the Administrator may choose to have an authorized representative observe the performance test conducted by the Permittee.
- (2) Should the results of this performance test not agree with the determination of catalytic thermal oxidizer performance based on the design analysis, then the results of the performance test will be used to establish compliance.

**D.6.11 Monitoring Procedures for Catalytic Thermal Oxidizer and Closed-Vent System [326 IAC 2-7-6(1)]  
[40 CFR 63, Subpart DD]**

- (a) Pursuant to 40 CFR 63.693(f)(3) and 40 CFR 63.695(e), the Permittee shall ensure that the catalytic thermal oxidizer operates properly in accordance with the performance requirements specified in Condition D.6.6 by monitoring the catalytic thermal oxidizer in accordance with the following requirements:
  - (1) A continuous monitoring system consisting of a temperature monitoring device capable of monitoring temperature at two locations equipped with a continuous recorder shall be installed and operated for the catalytic thermal oxidizer. One temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet and a second temperature sensor shall be installed at the nearest feasible point to the catalyst bed outlet.
    - (A) The continuous monitoring system shall measure either an instantaneous value at least once every 15 minutes or an average value for intervals of 15 minutes or less and continuously record either:
      - (i) Each measured data value; or
      - (ii) Each block average value for each 1-hour period or shorter periods calculated from all measured data values during each period. If values are measured more frequently than once per minute, a single value for each minute may be used to calculate the hourly (or shorter period) block average instead of all measured values.
    - (B) The continuous monitoring system must be installed, calibrated, operated, and maintained in accordance with the manufacturer's specifications or other written procedures that provide reasonable assurance that the monitoring equipment is operating properly.

- (2) Using data recorded by the monitoring system, the Permittee must calculate the daily average value for each monitored operating parameter (i.e., temperature at catalyst bed inlet and outlet) for each operating day. If operation of the catalytic thermal oxidizer is continuous, the operating day is the total number of hours of catalytic thermal oxidizer operation per 24-hour period. Valid data points must be available for 75 percent of the operating hours in an operating day to compute the daily average.
- (3) For each monitored operating parameter, the Permittee must establish a minimum operating parameter value to define the range of conditions at which the catalytic thermal oxidizer must be operated to continuously achieve the performance requirements in Condition D.6.6 and 40 CFR 63.693(f). The Permittee must establish the minimum catalyst bed inlet and outlet temperatures based on the control device design analysis and supplemented, as necessary, by the catalytic thermal oxidizer manufacturer's recommendations or other applicable information.
- (4) An excursion for the catalytic thermal oxidizer is determined to have occurred when the monitoring data or lack of monitoring data result in any one of the criteria specified below being met. If both the catalyst bed inlet and outlet temperatures meet the excursion criterion specified below during the same operating day, then a single excursion is determined to have occurred for the catalytic thermal oxidizer for that operating day.

  - (A) An excursion occurs when the daily average value of a monitored parameter (i.e., the catalyst bed inlet or outlet temperature) is less than the minimum operating parameter limit established for the operating parameter in accordance with the requirements of paragraph (a)(3) of this condition.
  - (B) An excursion occurs when the period of catalytic thermal oxidizer operation is 4 hours or greater in an operating day and the monitoring data are insufficient to constitute a valid hour of data for at least 75 percent of the operating hours. Monitoring data are insufficient to constitute a valid hour of data if measured values are unavailable for any of the 15-minute periods within the hour.
  - (C) An excursion occurs when the period of catalytic thermal oxidizer operation is less than 4 hours in an operating day and more than 1 of the hours during the period does not constitute a valid hour of data due to insufficient monitoring. Monitoring data are insufficient to constitute a valid hour of data if measured values are unavailable for any of the 15-minute periods within the hour.
- (5) For each excursion, except as provided for in paragraph (a)(6) of this condition, the Permittee shall be deemed to have failed to have applied control in a manner that achieves the required operating parameter limits. Failure to achieve the required operating parameter limits is a violation of this condition and 40 CFR 63, Subpart DD.
- (6) An excursion is not a violation of this condition and 40 CFR 63, Subpart DD under any one of the conditions listed below.

- (A)** An excursion is not a violation nor does it count toward the number of excused excursions allowed under paragraph (6)(B) of this condition when the excursion occurs during any one of the following periods:
      - (i)** During a period of startup, shutdown, or malfunction when the affected facility is operating during such period in accordance with the facility's startup, shutdown, and malfunction plan; or,
      - (ii)** During periods of non-operation of the unit or the process that is vented to the catalytic thermal oxidizer (resulting in cessation of HAP emissions to which the monitoring applies).
    - (B)** One excused excursion is allowed per semi-annual period for any reason. The initial semi-annual period is the 6-month reporting period addressed by the first semi-annual report submitted by the Permittee in accordance with 40 CFR 63.697(b)(4) and Condition D.6.22.
  - (7)** Nothing in this condition shall be construed to allow or excuse a monitoring parameter excursion caused by any activity that violates other applicable provisions of 40 CFR 63, Subpart DD.
- (b)** Pursuant to 40 CFR 63.693(c), the Permittee shall monitor the closed-vent system in accordance with the requirements listed below to ensure that the system is operated at a pressure below atmospheric pressure.
  - (1)** The system shall be equipped with at least one pressure gage or other pressure measurement device that can be read from a readily accessible location to verify that negative pressure is being maintained in the closed-vent system when the catalytic thermal oxidizer is operating.
  - (2)** In situations when the closed-vent system includes bypass devices that could be used to divert the vent stream from the closed vent system to the atmosphere at a point upstream of the catalytic thermal oxidizer inlet, each bypass device must be equipped with a flow indicator, as specified in 40 CFR 63.693 (c)(2)(i), which meets the following requirements:
    - (A)** The indicator must be installed at the entrance to the bypass line used to divert the vent stream from the closed-vent system to the atmosphere; and,
    - (B)** The flow indicator must indicate a reading at least once every 15 minutes.

Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, or pressure relief valves needed for safety reasons are not subject to the requirements of this paragraph of the condition.

- (c) Pursuant to 40 CFR 63.695(f), following the initial inspection and monitoring of a piece of air pollution control equipment in accordance with the applicable provisions of 40 CFR 63.695 and this condition, subsequent inspection and monitoring of the equipment may be performed at intervals longer than 1 year when the Permittee determines that performing the required inspection or monitoring procedures would expose a worker to dangerous, hazardous, or otherwise unsafe conditions and the Permittee complies with the requirements specified in paragraphs (1) and (2) below.
- (1) The Permittee must prepare and maintain at the plant site written documentation identifying the specific air pollution control equipment designated as “unsafe to inspect and monitor”. The documentation must include for each piece of air pollution control equipment designated as such a written explanation of the reasons why the equipment is unsafe to inspect or monitor using the applicable procedures under 40 CFR 63.695.
- (2) The Permittee must develop and implement a written plan and schedule to inspect and monitor the air pollution control equipment using the applicable procedures specified in 40 CFR 63.695 during times when a worker can safely access the air pollution control equipment. The required inspections and monitoring must be performed as frequently as practicable but do not need to be performed more frequently than the periodic schedule that would otherwise be applicable to the air pollution control equipment under the provisions of 40 CFR 63.695. A copy of the written plan and schedule must be maintained at the plant site.
- (d) Pursuant to 40 CFR 61.242-11(e), the Permittee shall monitor the catalytic thermal oxidizer to ensure that it is operated and maintained in conformance with its design.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.6.12 Monitoring Procedures for Tanks with Level 1 Controls [326 IAC 2-7-6(1)] [40 CFR 63, Subpart OO]**  
Pursuant to 40 CFR 63, Subpart OO, the Permittee shall inspect and monitor each tank equipped with Level 1 controls in accordance with the requirements specified in 40 CFR 63.906(a) and (b).

- (a) The Permittee shall meet the following inspection requirements:
- (1) The fixed roof and its closure devices shall be visually inspected by the Permittee to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices.
- (2) The Permittee shall perform an initial inspection following the installation of each fixed roof. Thereafter, the Permittee shall perform the inspections at least once every calendar year except as provided for in 40 CFR 63.906(d).
- (3) In the event that a defect is detected, the Permittee shall repair the defect in accordance with the requirements of paragraph (b) of this condition.

**(b) The Permittee shall repair all detected defects as follows:**

- (1) The Permittee shall make first efforts at repair of the defect no later than five (5) calendar days after detection and repair shall be completed as soon as possible but no later than 45 calendar days after detection except as provided in paragraph (b)(2) of this condition.**
- (2) Repair of a defect may be delayed beyond 45 calendar days if the Permittee determines that repair of the defect requires emptying or temporary removal from service of the tank and no alternative tank capacity is available at the site to accept the regulated material normally managed in the tank. In this case, the Permittee shall repair the defect the next time alternative tank capacity becomes available and the tank can be emptied or temporarily removed from service, as necessary to complete the repair.**

**D.6.13 Monitoring Procedures for Tanks with Maximum Organic Vapor Pressure Equal to or Greater than 76.6kPa [326 IAC 2-7-6(1)] [40 CFR 63, Subpart DD]**

Pursuant to 40 CFR 63.695(b), the tanks, EU-TK39, EU-TK51, EU-TK52, and EU-TK53, equipped with a fixed roof in accordance with the provisions of 40 CFR 63.685(g) shall meet the requirements in items (a) and (b) below.

**(a) Pursuant to 40 CFR 63.695(b)(3), the Permittee shall meet the following inspection requirements for each tank:**

- (1) The fixed roof and its closure devices shall be visually inspected by the Permittee to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the separator wall; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. In the case when a tank is buried partially or entirely underground, inspection is required only for those portions of the cover that extend to or above the ground surface, and those connections that are on such portions of the cover (e.g., fill ports, access hatches, gauge wells, etc.) and can be opened to the atmosphere.**
- (2) The Permittee shall perform an initial inspection following installation of the fixed roof. Thereafter, the Permittee shall perform the inspections at least once every calendar year except as provided for under 40 CFR 63.695(f).**
- (3) In the event that a defect is detected, the Permittee shall repair the defect in accordance with the requirements of paragraph (b) of this condition.**

**(b) Pursuant to 40 CFR 63.695(b)(4), the Permittee shall repair each defect detected during an inspection performed in accordance with the requirements in paragraph (a) of this condition in the following manner:**

- (1) The Permittee shall, within 45 calendar days of detecting the defect, either repair the defect or empty the tank and remove it from service. If within this 45-day period the defect cannot be repaired or the tank cannot be removed from service without disrupting operations at the plant site, the Permittee is allowed two 30-day extensions.**

- (2) In cases when the Permittee elects to use a 30-day extension, the Permittee shall prepare and maintain documentation describing the defect, explaining why alternative storage capacity is not available, and specify a schedule of actions that will ensure that the control equipment will be repaired or the tank emptied as soon as possible.
- (3) When a defect is detected during an inspection of a tank that has been emptied and degassed, the Permittee shall repair the defect before refilling the tank.

**D.6.14 Monitoring Procedures for Containers [326 IAC 2-7-6(1)] [40 CFR 63, Subpart DD and Subpart PP]**  
Pursuant to 40 CFR 63.926(a) and 40 CFR 63.923(e), the Permittee shall inspect the container and its cover and closure devices as follows:

- (a) In the case when a regulated material already is in the container at the time the Permittee first accepts possession of the container at the facility site and the container is not emptied (i.e., does not meet the conditions for an empty container as defined in 40 CFR 63.921) within 24 hours after the container has been accepted at the facility site, the container and its cover and closure devices shall be visually inspected by the Permittee to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. This inspection of the container must be conducted on or before the date that the container is accepted at the facility (i.e., the date that the container becomes subject to the standards under 40 CFR 63, Subpart PP). For the purpose of this requirement, the date of acceptance is the date of signature of the Permittee on the manifest or shipping papers accompanying the container. If a defect is detected, the Permittee shall repair the defect in accordance with the requirements of 40 CFR 63.926(a)(3) and paragraph (c) of this condition.
- (b) In the case when a container filled or partially filled with regulated material remains unopened at the facility site for a period of 1 year or more, the container and its cover and closure devices shall be visually inspected by the Permittee initially and thereafter, at least once every calendar year, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the Permittee shall repair the defect in accordance with the requirements of 40 CFR 63.926(a)(3) and paragraph (c) of this condition.
- (c) When a defect is detected for the container, cover, or closure devices, the Permittee shall either empty the regulated material from the defective container in accordance with paragraph (c)(1) of this condition or repair the defective container in accordance with paragraph (c)(2) of this condition.
  - (1) If the Permittee elects to empty the regulated material from the defective container, the Permittee shall remove the regulated material from the defective container to meet the conditions for an empty container, as defined in 40 CFR 63.921, and transfer the removed regulated material to either a container that meets the applicable standards under 40 CFR 63, Subpart PP or treatment unit that meets the applicable standards under 40 CFR 63, Subpart DD. Transfer of the regulated material must be completed no later than 5 calendar days after detection of the defect. The emptied defective container must be either repaired, destroyed, or used for purposes other than management of regulated material.

- (2) If the Permittee elects not to empty the regulated material from the defective container, the Permittee must repair the defective container. First efforts at repair of the defect must be made no later than 24 hours after detection and repair must be completed as soon as possible but no later than 5 calendar days after detection. If repair of a defect cannot be completed within 5 calendar days, then the regulated material must be emptied from the container and the container must not be used to manage regulated material until the defect is repaired.

**D.6.15 Monitoring Procedures for Catalytic Thermal Oxidizer and Closed-Vent System [326 IAC 2-7-6(1)]  
[40 CFR 63, Subpart DD]**

Pursuant to 40 CFR 63.693(b)(4) and 40 CFR 63.695(c)(2) and (3), to determine compliance with Condition D.6.6, the Permittee shall meet the following inspection and monitoring requirements for the closed-vent system:

- (a) The closed-vent system shall be visually inspected by the Permittee to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in ductwork or piping; loose connections; or broken or missing caps or other closure devices.
- (b) The Permittee shall perform an initial inspection following installation of the closed-vent system. Thereafter, The Permittee must perform the inspections at least once every calendar year except as provided for in paragraph (d) of this condition.
- (c) In the event that a defect is detected, the Permittee shall repair the defect in accordance with the requirements of 40 CFR 63.695(c)(3) and of paragraph (b)(4) of this condition.
- (d) The Permittee shall repair all detected defects as follows:
  - (1) The Permittee shall make first efforts at repair of a defect no later than 5 calendar days after detection and repair shall be completed as soon as possible but no later than 45 calendar days after detection.
  - (2) Repair of a defect may be delayed beyond 45 calendar days if either of the conditions specified below occurs. In this case, the Permittee must repair the defect the next time the process or unit that vents to the closed-vent system is shutdown. Repair of the defect must be completed before the process or unit resumes operation.
    - (A) Completion of the repair is technically infeasible without the shutdown of the process or unit that vents to the closed-vent system.
    - (B) The Permittee determines that the air emissions resulting from the repair of the defect within the specified period would be greater than the fugitive emissions likely to result by delaying the repair until the next time the process or unit that vents to the closed-vent system is shutdown.

**D.6.16 Monitoring Procedures for Equipment Leaks [326 IAC 2-7-6(1)] [40 CFR 61, Subpart V] [40 CFR 63, Subpart DD]**

Pursuant to 40 CFR 61, Subpart V, the Permittee must conduct monitoring in accordance with the paragraphs listed below to comply with leak detection requirements.

- (a) Pursuant to 40 CFR 61.242-2, the following standards apply to pumps:
  - (1) Each pump shall be monitored monthly to detect leaks by the methods specified in 40 CFR 61.245(b).
  - (2) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
  - (3) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
  - (4) If there are indications of liquids dripping from the pump seal, a leak is detected.
  - (5) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after each leak is detected, except as provided in 40 CFR 61.242-10 and paragraph (e) of this condition.
  - (6) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (b) Pursuant to 40 CFR 61.242-4(b)(2), no later than 5 calendar days after a pressure release, the pressure relief device in gas/vapor service shall be monitored to confirm the condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 61.245(c).
- (c) Pursuant to 40 CFR 61.242-7, the standards listed below apply to valves.
  - (1) Each valve shall be monitored monthly to detect leaks by the method specified in 40 CFR 61.245(b).
  - (2) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
  - (3) Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected.
  - (4) If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.
  - (5) When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after the leak is detected, except as provided in 40 CFR 61.242-10 and paragraph (e) of this condition.

- (6) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.**
  - (7) First attempts at repair include, but are not limited to, the following best practices where practicable:**
    - (A) Tightening of bonnet bolts;**
    - (B) Replacement of bonnet bolts;**
    - (C) Tightening of packing gland nuts; and,**
    - (D) Injection of lubricant into lubricated packing.**
- (d) Pursuant to 40 CFR 61.242-8, pressure relief devices in liquid service and flanges and other connectors shall be monitored within 5 days by the method specified in 40 CFR 61.245(b) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method.**
  - (1) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.**
  - (2) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 61.242-10 and paragraph (e) of this condition.**
  - (3) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.**
  - (4) First attempts at repair include, but are not limited to, the best practices described under 40 CFR 61.242-7(e) and paragraph (c)(7) of this condition.**
- (e) Pursuant to 40 CFR 61.242-10 (Standards: Delay of Repair), the standards listed below apply to delay of repair of equipment.**
  - (1) Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.**
  - (2) Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the process that does not remain in VHAP service.**
  - (3) Delay of repair for valves will be allowed if:**
    - (A) The Permittee demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair; and,**
    - (B) When repair procedures are affected, the purged material is collected and destroyed or recovered in the catalytic thermal oxidizer.**
  - (4) Delay of repair for pumps will be allowed if:**

- (A) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system; and
  - (B) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
- (5) Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
- (f) Pursuant to 40 CFR 61.242-11(f), the monitoring requirements listed below apply to the closed-vent system.
  - (1) Closed-vent systems shall be monitored to determine compliance with 40 CFR 61.242-11 initially in accordance with 40 CFR 61.05, annually, and at other times requested by the US EPA Administrator or IDEM, OAM.
  - (2) Leaks, as indicated by an instrument reading greater than 500 ppm and visual inspections, shall be repaired as soon as practicable, but not later than 15 calendar days after the leak is detected.
  - (3) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19][40 CFR 63]**

**D.6.17 General Record Keeping Requirements [40 CFR 63, Subpart A] [40 CFR 63, Subpart DD]**

- (a) Pursuant to 40 CFR 63.696(a), the Permittee shall comply with the record keeping requirements in 40 CFR 63.10, under 40 CFR 63 Subpart A – General Provisions, that are applicable to 40 CFR 63, Subpart DD, as specified in Table 2 of Subpart DD.
- (b) Pursuant to 40 CFR 63.6(e)(3), to document compliance with the SSM Plan requirement, the Permittee shall comply with the record keeping requirements of this paragraph.
  - (1) When actions taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the SSM Plan, the Permittee shall keep records for that event in accordance with 40 CFR 63.6(e)(3)(iii).
  - (2) If an action taken by the Permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the SSM Plan, the Permittee shall record the actions taken for that event in accordance with 40 CFR 63.6(e)(3)(iv).

**D.6.18 Record Keeping Requirements for Tanks with Level 1 Controls [40 CFR 63, Subpart DD [40 CFR 63, Subpart OO]**

Pursuant to 40 CFR 63.907, to document compliance with Conditions D.6.3 and D.6.11 and 40 CFR 63, Subpart OO, the Permittee shall maintain records in accordance items (a) through (c) below.

- (a) The Permittee shall prepare and maintain a record for each tank subject to 40 CFR 63, Subpart OO that includes the following information:
  - (1) A tank identification number (or other unique identification description as selected by the Permittee);
  - (2) A description of the tank dimensions and the tank design capacity; and,
  - (3) The date that each inspection required by Condition D.6.12 is performed.
- (b) The Permittee shall record the following information for each defect detected during inspections required by 40 CFR 63.906 and Condition D.6.12:
  - (1) The location of the defect;
  - (2) A description of the defect;
  - (3) The date of detection; and,
  - (4) Corrective action taken to repair the defect.
- (c) In the event that repair of the defect is delayed in accordance with the provisions of 40 CFR 63.907(b)(2), the Permittee shall also record the reason for the delay and the date that completion of repair of the defect is expected.

**D.6.19 Record Keeping Requirements for Tanks with Maximum Organic Vapor Pressure Equal to or Greater than 76.6kPa [40 CFR 63, Subpart DD] [40 CFR 63, Subpart OO]**

To document compliance with Conditions D.6.4 and D.6.12 and D.6.14 and 40 CFR 63, Subpart DD, the Permittee shall maintain records in accordance with 40 CFR 63.696(e) and 40 CFR 63.695(b)(4)(i).

- (a) Pursuant to 40 CFR 63.696(e), the Permittee shall prepare and maintain the following records for tanks using a fixed roof to comply with the tank control requirements specified in 40 CFR 63.685(g) and Condition D.6.4:
  - (1) A record for each inspection required by 40 CFR 63.695(b) and conditions D.6.12 and D.6.14, as applicable to the tank, that includes the following information: a tank identification number (or other unique identification description as selected by the Permittee) and the date of inspection.
  - (2) The Permittee shall record for each defect detected during inspections required by 40 CFR 63.695(b) and Conditions D.6.12 and D.6.14 the following information:

- (A) The location of the defect;
  - (B) A description of the defect;
  - (C) The date of detection; and,
  - (D) Corrective action taken to repair the defect.
- (b) In the event that repair of the defect is delayed in accordance with the provisions of 40 CFR 63.695(b)(4) and Condition D.6.13, the Permittee shall also record the reason for the delay and the date that completion of repair of the defect is expected.
- (c) Pursuant to 40 CFR 63.695(b)(4)(i), in cases when the Permittee elects to use a 30-day extension to repair a defect, the Permittee shall prepare and maintain documentation describing the defect, explaining why alternative storage capacity is not available, and specify a schedule of actions that will ensure that the control equipment will be repaired or the tank emptied as soon as possible.

**D.6.20 Record Keeping Requirements for Catalytic Thermal Oxidizer and Closed-Vent System**  
**[40 CFR 63, Subpart DD]**

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- (a) Pursuant to 40 CFR 63.696(b), the Permittee shall maintain the records for the catalytic thermal oxidizer in accordance with the requirements of 40 CFR 63.10.
- (b) To document compliance with Condition D.6.6 and D.6.15, the Permittee shall maintain records for the closed-vent system and catalytic thermal oxidizer in accordance with the requirements of 40 CFR 63.696.
  - (1) Pursuant to 40 CFR 63.696(g), the Permittee shall record, on a semi-annual basis, the information specified below for those planned routine maintenance operations that would require the catalytic thermal oxidizer not to meet the requirements of 40 CFR 63.693(f).
    - (A) The Permittee shall record a description of the planned routine maintenance that is anticipated to be performed for the catalytic thermal oxidizer during the next 6 months. This description shall include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods.
    - (B) The Permittee shall record a description of the planned routine maintenance that was performed for the catalytic thermal oxidizer during the previous 6 months. This description shall include the type of maintenance performed and the total number of hours during these 6 months that the catalytic thermal oxidizer did not meet the requirements of 40 CFR 63.693(f), as applicable, due to planned routine maintenance.
  - (2) Pursuant to 40 CFR 63.696(h), the Permittee shall record the following information for those unexpected control device system malfunctions that would require the catalytic thermal oxidizer not to meet the requirements of 40 CFR 63.693(f), as applicable:

- (A) The occurrence and duration of each malfunction of the control device system;
  - (B) The duration of each period during a malfunction when gases, vapors, or fumes are vented from the waste management unit through the closed-vent system to the catalytic thermal oxidizer while the catalytic thermal oxidizer is not properly functioning; and,
  - (C) Actions taken during periods of malfunction to restore a malfunctioning control device to its normal or usual manner of operation.
- (3) Pursuant to 40 CFR 63.695(c)(2)(iv), the Permittee shall maintain a record of inspections performed in accordance with 40 CFR 63.695(c).
- (4) Pursuant to 40 CFR 63.695(c)(3)(iii), the Permittee shall maintain a record of defect repair.
- (c) Pursuant to 40 CFR 63.693(c)(2)(i) and Condition D.6.15(c)(2)(A), the Permittee shall maintain records of the following information: hourly records of whether the flow indicator was operating and whether flow was detected at any time during the hour; and records of all periods when flow is detected or the flow indicator is not operating.

**D.6.21 Record Keeping Requirements for Equipment Leaks [40 CFR 63, Subpart DD] [40 CFR 61, Subpart V]**

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Pursuant to 40 CFR 61.246, the Permittee shall comply with the record keeping requirements of this paragraph.

- (a) The Permittee may comply with the record keeping requirements for the process units in one record keeping system if the system identifies each record by each process unit.
- (b) When each leak is detected as specified in 40 CFR 61, Sections 242-2, 242-7, and 242-8 and in Condition D.6.16, the following requirements apply:
  - (1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
  - (2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in 40 CFR 61.242-7(c) and Condition D.6.16 and no leak has been detected during those 2 months.
  - (3) The identification on equipment, except on a valve, may be removed after it has been repaired.
- (c) When each leak is detected as specified in 40 CFR 61, Sections 242-2, 242-7, and 242-8 and in Condition D.6.16, the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location:
  - (1) The instrument and operator identification numbers and the equipment identification number;

- (2) The date the leak was detected and the dates of each attempt to repair the leak;
  - (3) Repair methods applied in each attempt to repair the leak;
  - (4) "Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 61.245(a) after each repair attempt is equal to or greater than 10,000 ppm.
  - (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak;
  - (6) The signature of the Permittee (or designate) whose decision it was that the repair could not be effected without a process shutdown;
  - (7) The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days;
  - (8) Dates of process unit shutdowns that occur while the equipment is un-repaired; and,
  - (9) The date of successful repair of the leak.
- (d) The following information pertaining to the design requirements for the closed-vent system and catalytic thermal oxidizer shall be recorded and kept in a readily accessible location:
  - (1) Detailed schematics, design specifications, and piping and instrumentation diagrams;
  - (2) The dates and descriptions of any changes in the design specifications;
  - (3) A description of the parameter or parameters monitored, as required in 40 CFR 61.242-11(e) and Condition D.6.16, to ensure that the catalytic thermal oxidizer is operated and maintained in conformance with its design and an explanation of why that parameter (or parameters) was selected for the monitoring;
  - (4) Periods when the closed-vent system and catalytic thermal oxidizer are not operated as designed; and,
  - (5) Dates of startups and shutdowns of the closed-vent system and catalytic thermal oxidizer.
- (e) The following information pertaining to all equipment to which a standard applies shall be recorded in a log that is kept in a readily accessible location:
  - (1) A list of identification numbers for equipment (except welded fittings) subject to the requirements of 40 CFR 61, Subpart V;
  - (2) A list of identification numbers for equipment that the Permittee elects to designate for no detectable emissions as indicated by an instrument reading of less than 500 ppm above background. The designation of this equipment for no detectable emissions shall be signed by the Permittee;

- (3) A list of equipment identification numbers for pressure relief devices required to comply with 40 CFR 61.242-4(a) and Condition D.6.7(c)(1); and,
- (4) The following information for each compliance test required in 40 CFR 61.242-4 and Condition D.6.7(c)(1):
  - (A) The dates of each compliance test required in 40 CFR 61.242-4 and Condition D.6.7(c)(1);
  - (B) The background level measured during each compliance test; and,
  - (C) The maximum instrument reading measured at the equipment during each compliance test.

**D.6.22 Reporting Requirements [40 CFR 63, Subpart A] [40 CFR 63, Subpart DD] [40 CFR 61, Subpart V]**

- (a) Pursuant to 40 CFR 63.697(a), the Permittee shall comply with the notification requirements specified in paragraph (a)(1) of this condition and the reporting requirements specified in paragraph (a)(2) of this condition.
  - (1) The Permittee submitted an initial notification in accordance with 40 CFR 63.9(b) on April 7, 1997.
  - (2) The Permittee must submit reports to the US EPA Administrator and IDEM, OAM in accordance with the applicable reporting requirements in 40 CFR 63.10 as specified in Table 2 of 40 CFR 63, Subpart DD.
- (b) Pursuant to 40 CFR 63.697(b), the Permittee shall submit the following notifications and reports regarding the closed-vent system and catalytic thermal oxidizer to the US EPA Administrator and IDEM, OAM:
  - (1) A Notification of Performance Tests specified in 40 CFR 63.7 and 40 CFR 63.9(g);
  - (2) Performance test reports specified in 40 CFR 63.10(d)(2);
  - (3) Startup, shutdown, and malfunction reports specified in 40 CFR 63.10(d)(5);
    - (A) If actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee shall state such information in the report. The startup, shutdown, or malfunction report shall consist of a letter, containing the name, title, and signature of the responsible official who is certifying its accuracy, that shall be submitted to the US EPA Administrator and IDEM, OAM; and,

- (B) Separate startup, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (b) (4) of this condition.
- (4) A summary report specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis (i.e., once every 6-month period).
  - (A) The summary report must include a description of all excursions as defined in 40 CFR 63.695(e) that have occurred during the 6-month reporting period.
  - (B) For each excursion caused when the daily average value of a monitored operating parameter is less than the minimum operating parameter limit, the report must include the daily average values of the monitored parameter, the applicable operating parameter limit, and the date and duration of the period that the exceedance occurred.
  - (C) For each excursion caused by lack of monitoring data, the report must include the date and duration of the period when the monitoring data were not collected and the reason why the data were not collected.
- (c) Pursuant to 40 CFR 61.247, the Permittee shall comply with the reporting requirements of this paragraph.
  - (1) The Permittee shall submit a statement in writing notifying the US EPA Administrator and IDEM, OAM that the requirements of 40 CFR 61.242, 61.245, 61.246, and 61.247 are being implemented.
    - (A) The statement is to be submitted within 90 days of the effective date;
    - (B) The statement is to contain the following information for each source:
      - (i) Equipment identification number and process unit identification;
      - (ii) Type of equipment (for example, a pump or pipeline valve);
      - (iii) Percent by weight VHAP in the fluid at the equipment;
      - (iv) Process fluid state at the equipment (gas/vapor or liquid); and,
      - (v) Method of compliance with the standard (for example, "monthly leak detection and repair" or "equipped with dual mechanical seals").
  - (2) A report shall be submitted to the US EPA Administrator and IDEM, OAM semi-annually starting 6 months after the initial report required in paragraph (1) of this condition, that includes the following information:

- (A) Process unit identification;
  - (B) For each month during the semi-annual reporting period:
    - (i) Number of valves for which leaks were detected as described in 40 CFR 61.242-7(b) and Condition D.6.16(c)(2);
    - (ii) Number of valves for which leaks were not repaired as required in 40 CFR 61.242-7(d) and Condition D.6.16(c)(5);
    - (iii) Number of pumps for which leaks were detected as described in 40 CFR 61.242-2(b) and Conditions D.6.16(a)(3) and (4);
    - (iv) Number of pumps for which leaks were not repaired as required in 40 CFR 61.242-2(c) and Condition D.6.16(a)(5) and (6); and,
    - (v) The facts that explain any delay of repairs and, where appropriate, why a process unit shutdown was technically infeasible.
  - (C) Dates of process unit shutdowns which occurred within the semi-annual reporting period;
  - (D) Revisions to items reported according to paragraph (c)(1) of this condition if changes have occurred since the initial report or subsequent revisions to the initial report; and,
  - (E) The results of all performance tests and monitoring to determine compliance with no detectable emissions conducted within the semi-annual reporting period.
- (3) In the first report submitted as required in paragraph (c)(1) of this condition, the report shall include a reporting schedule stating the months that semi-annual reports shall be submitted. Subsequent reports shall be submitted according to that schedule, unless a revised schedule has been submitted in a previous semi- annual report.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### Front Page

1. The expiration has been added to the signature box. The expiration is exactly 5 years after the issuance date. For example, if the permit was issued December 13, 1996, the expiration date would be December 13, 2001.

Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:  <b>Expiration Date:</b>
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2. The rule cite for ENSR has been removed from the second paragraph of the title page as follows. This rule has been repealed.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and ~~326 IAC 2-1-3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

## Section B

3. Condition B.1 (Permit No Defense) has been deleted. This is not in IC13, but IDEM has the general authority for this in 326 IAC 2-7-15. Therefore, most of this language has been added to Condition B.14 (now B.13)(Permit Shield). Condition B.14 (now B.13) provides for when the possession of a permit does provide a defense and provides that it is only for those requirements in existence at the time of permit issuance. All other B conditions have been re-numbered as a result of this change.

### ~~B.1 Permit No Defense [IC 13]~~

~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~

~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

4. Condition B.2 (now B.1) (Definitions) has been revised as follows.

### B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any~~ **the** applicable definitions found in **the statutes or regulations** (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

5. Condition B.3 (now B.2) (Permit Term) has had language added to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be five (5) years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the **effective original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

6. Condition B.4 (now B.3)(Enforceability) (a) has been removed from the rule cite, because the condition refers to all of 326 IAC 2-7-7. B.4(b) has been deleted and combined with Condition B.4(a) as follows:

### B.4 Enforceability [326 IAC 2-7-7(a)]

- 
- (a) **Unless otherwise stated**, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM **the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.**
- (b) ~~Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.~~
7. Condition B.8 (now B.7) (Duty to Supplement and Provide Information) language has been added to clarify what types of documents must be certified by the responsible official. Condition B.8(c) has been revised as follows to clarify the procedures for a claim of confidentiality.
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]  
**[326 IAC 2-7-6(6)]**
- 
- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. **The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]**
- (c) ~~Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the~~ The Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17 may include a claim of confidentiality in accordance with 326 IAC 17. ~~If requested by IDEM, OAM, or the U.S. EPA, to~~ **When** furnishing copies of requested records directly to U. S. EPA,. ~~and if the~~ **The** Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with **may assert** a claim of confidentiality ~~under in accordance with 40 CFR 2, Subpart B.~~
8. Condition B.9 (now B.8) (Compliance with Permit Conditions) has been modified to show that conditions that are not federally enforceable may not constitute a violation of the Clean Air Act as follows: Condition B.9 (now B.8) (Compliance with Permit Conditions) (c) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures as follows:
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- 
- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as not federally enforceable**, constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.**
9. Condition B.10 (now B.9) (Certification) “under this permit” has been deleted and revised as well as clarifying when a certification is needed as follows:
- B.10 (now B.9) Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- (a) **Where specifically designated by this permit or required by an applicable requirement, Any any** application form, report, or compliance certification submitted ~~under this permit~~ shall contain certification by a responsible official of truth, accuracy, and completeness. This certification ~~and any other certification required under this permit~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
  - (b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.
  - (c) A responsible official is defined at 326 IAC 2-7-1(34).
10. Condition B.11 (now B.10) (Annual Compliance Certification) the word “appropriate” has been added to Condition B.11(c)(1). There is a non-rule policy document for annual compliance certifications which was intended to clarify the requirements of 326 IAC 2-7-6(5). The revision in Condition B.11(c)(1) was made to help clarify the intent which is covered in the NRPD.

As part of the U.S. EPA’s 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from “continuous or intermittent compliance” to “based on continuous or intermittent data” The U.S. District Court of Appeals, Washington D.C. ruled against EPA’s language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law as follows in Condition B.11:

Condition B.11 (now B.10) (Annual Compliance Certification) paragraph (a) has been revised to clarify that the initial certification is from the date of issuance until December 31. Paragraph (c) has been revised so that it matches the language in the rule. Condition B.11(Annual Compliance Certification) delete (c)(5), OAM has decided that although we have the authority, it may be cumbersome for the source to list all insignificant activities in the annual compliance certification, so the requirement is being deleted from the permit. We have already received requests to take this out, and expect considerable more when sources do the first annual compliance certification.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** The certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;
  - (4) The methods used for determining **the compliance status** of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
  - ~~(5) Any insignificant activity that has been added without a permit revision; and~~
  - ~~(6)~~**(5)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

11. Condition B.12 (now B.11) (Preventive Maintenance Plan) language has been added to clarify that the PMP and the PMP extension request do not need to be certified by the responsible official. "Preventive Maintenance Plans" has been replaced with "PMPs" throughout the condition, since it has already been defined. In B.12(c) language was added that says the source has a reasonable time to provide a PMP when IDEM, OAM requests it. Record keeping requirements have been added to this condition:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- 
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond **it's the Permittee's** control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

**The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ **PMPs** as necessary to ensure ~~lack of proper maintenance~~ **failure to implement a PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) ~~PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.~~

**A copy of the PMP's shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM,. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

12. In Condition B.13 (now B.12) (Emergency Provisions) a reference to the Emergency Occurrence Report Form has been added to Condition B.13(b)(5) (now B.12(b)(5)). The emergency form is for emergencies only , and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. In paragraph (d), part of the first sentence has been deleted. Since this is a Part 70 source, the malfunction rule has been superceded by the emergency rule. The rule cite in paragraph (e) has been revised to reflect the new Article 2 rule Paragraph (f) "compliance" has been changed to "accordance".

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent notice**, either ~~in writing by mail or facsimile, of the emergency to:~~

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4(c)(9)~~ **2-7-4(c)(10)** be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

13. Condition B.14 (now B.13) (Permit Shield) has incorporated some of the language from Condition B.1 and has been reworded to clarify the intent. Condition B.14 (now B.13) (Permit Shield) paragraph (d) has been revised to clarify the intent of the condition. In Condition B.14 (now B.13)(d) some of the language has been removed because it is unnecessary and would be contradictory to IDEM's revision of operating permits as follows:

**B.14 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) ~~This condition provides a permit shield as addressed in 326 IAC 2-7-15. Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.~~

**This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.**

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. **All previously issued operating permits are superceded by this permit.** ~~Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:~~
  - (1) ~~The applicable requirements are included and specifically identified in this permit;~~  
~~or~~
  - (2) ~~The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit,~~ IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)(8)]

14. Condition B.16 (now B.15) (Deviations from Permit Requirements and Conditions) has been revised because IDEM is no longer requiring sources to report deviations in 10 days. Sources will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since IDEM relaxed the ten (10) day notification to a quarterly report.

**B.16** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch **Data Section**, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~

**The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
  - ~~(3)(2)~~ **(2)** Failure to implement elements of the Preventive Maintenance Plan unless ~~lack of~~ **such failure** has caused or contributed to a deviation.
  - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- (c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**
- ~~(e) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).~~
- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

15. Condition B.17 (now B.16) (Permit Modification, Reopening, Revocation and Reissuance, or Termination ) it was confusing to have the responsible official certification at the end of the condition, therefore it has been moved to (a) as follows:

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)]  
[326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] **The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)].

16. Language has been added to clarify that an application to renew the permit must be certified by the responsible official in Condition B.18(a) (now B.17(a)) as follows. In addition Condition B.18(b)(1) (B) (now B.17(b)(1)(B)) (Permit Renewal) 326 IAC 2-5 has been repealed.

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). **The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. ~~[326 IAC 2-5-3]~~

17. Condition B.19 (now B.18) (Permit Amendment or Modification) (a) has been revised because IDEM does not want a source to be liable for both a TV permit violation and a rule violation. Condition B.19 (now B.18) (Permit Amendment or Modification) 326 IAC 2-7-4(f) revised to clarify that all applications need to be certified by the responsible official. EPA has also requested this change.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

- (a) ~~The Permittee must comply with~~ **Permit amendments and modifications are governed by** the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule.~~
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

18. Condition B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) has been deleted as follows.

~~**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

- ~~(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~
- ~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

19. In Condition B.21 (Operational Flexibility), the rule cite in (a)(2) was changed to reference 326 IAC 2-7-10.5. The outline in Condition B.22(b) has been revised so that it follows the numbering system that is in the rest of the permit. Condition B.22(e) has been deleted as follows:

**B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any **preconstruction** approval required by 326 IAC ~~2-4-4~~ **2-7-10.5** has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) ~~For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

- ~~(1) A brief description of the change within the source;~~
- ~~(2) The date on which the change will occur;~~
- ~~(3) Any change in emissions; and~~
- ~~(4) Any permit term or condition that is no longer applicable as a result of the change.~~

**The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:**

**For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:**

- (1) A brief description of the change within the source;**
- (2) The date on which the change will occur;**
- (3) Any change in emissions; and**
- (4) Any permit term or condition that is no longer applicable as a result of the change.**

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
  - (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
  - ~~(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~
20. Condition B.23 (now B.21) (Construction Permit Requirement) has been revised to address the correct rules for construction at a TV source. It was also revised because IDEM does not want a source to be liable for both a TV permit violation and a rule violation. The referenced statute has been repealed therefore this condition has been revised as follows:
- B.23 Construction Permit Source Modification Requirement [326 IAC 2-7-10.5]**  
~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, A~~  
~~modification, construction, or reconstruction shall be approved if required by and in~~  
~~accordance with is governed by of 326 IAC 2 and 326 IAC 2-7-10.5.~~
21. Condition B.24 (now B.22) (Inspection and Entry) in order to clarify confidentiality Condition B.24 has been revised. OAM also determined that subpart (1) and (2) of paragraph (e) were unnecessary, therefore they have been deleted as follows:
- B.24 Inspection and Entry [326 IAC 2-7-6(2)] [IC 13-14-2-2]**  
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:
- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) Have access to and copy, ~~at reasonable times~~, any records that must be kept under the conditions of this permit;
  - (c) Inspect, ~~at reasonable times~~, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
  - (d) Sample or monitor, ~~at reasonable times~~, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
  - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. ~~[326 IAC 2-7-6(6)]~~
- ~~(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM,~~

~~OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

~~(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

22. Condition B.25 (now B.23) (Transfer of Ownership or Operation) 326 IAC 2-1 has been repealed therefore this condition has been modified as follows:

~~B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]  
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~

- ~~(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~
- ~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(c) IDEM, OAM, shall reserve the right to issue a new permit.~~

**B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

23. Condition B.26 (now B.24) (Annual Fee Payment) (b) has been revised.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.**

- (b) ~~Failure~~ **Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.

24. Condition B.27 (now B.25) (Enhanced New Source Review) has been deleted and replaced as follows:

~~B.27 — Enhanced New Source Review [326 IAC 2]~~

~~The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.~~

**B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5] [326 IAC 2-1.1-9]**

- (a) **The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.**
- (b) **Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.**
25. Condition B.28 (Credible Evidence) This condition has been removed from the Title V permits. IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or non-compliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.28 — Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

26. Condition C.2 has been updated to reflect the revision in 326 IAC 5-1-2 dated November 1, 1998 as follows:

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary **Alternative Opacity Limitations Exemptions**), ~~visible emissions~~ opacity shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, any one (1) ~~six (6) minute averaging period~~ as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor** in a six (6) hour period.
27. Condition C.4 (Incineration) has been revised to be consistent with wording in other conditions as follows:

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **326 IAC 9-1-2 is not federally enforceable.**

28. Condition C.6 (Operation of Equipment) has been revised since there may be control devices that are not required to be used to assure compliance with emission limitations as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

**Except as otherwise provided by statute rule, or in this permit, All** air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

29. Condition C.7 (Asbestos Abatement Projects) paragraph (e) has been revised to more accurately reflect the rule and has had the rule cite in the title changed to make it more generalized as follows:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] ~~[40 CFR 61.140]~~ **[40 CFR 61, Subpart M]**

- (e) Procedures for Asbestos Emission Control

The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are ~~mandatory~~ **applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

30. Condition C.8 (Performance Testing) has been rearranged for clarity as follows: Language has also been added to indicate that the test protocol and the notification of the test date do not require certification by the responsible official.

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~ **The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (b) **The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- ~~(b)(c)~~ **Pursuant to 326 IAC 3-6-4(b), all** test reports must be received by IDEM, OAM ~~within~~ **no later than** forty-five (45) days after the completion of the testing. An extension may be granted by ~~Commissioner~~ **IDEM, OAM**, if the source submits to IDEM, OAM, a reasonable written explanation ~~within~~ **no later than** five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

31. C.9 (Compliance Schedule) this condition was removed from the Title V model permit because it is an application requirement, not a permit requirement.

~~C.9 Compliance Schedule [326 IAC 2-7-6(3)]~~

~~The Permittee:~~

- ~~(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and~~
- ~~(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and~~
- ~~(c) Will comply with such applicable requirements that become effective during the term of this permit.~~

32. Condition C.9 (Compliance Requirements) has been added and refers to our general compliance authority in 326 IAC 2-1.1-11.

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.9 Compliance Requirements [326 IAC 2-1.1-11]**

**The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.**

33. Condition C.10 (Compliance Monitoring) has been revised as follows to clarify that new emission units must begin compliance monitoring upon start-up. Existing units should continue any already required compliance monitoring, but have 90 days to start any CM that has been added as a result of TV review.

**C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

**Compliance with applicable requirements shall be documented as required by this permit. Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, The the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:**

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Unless otherwise specified in the approval for the new emission unit(s) compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.**

34. Condition C.11 (Maintenance of Emission Monitoring Equipment) has had the language revised to clarify the intent of the condition as follows:

**C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less **often** than **once an (1) hour** until such time as the continuous monitor is back in operation.

35. Condition C.12 (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit.

**C.12 Monitoring Methods [326 IAC 3]**

Any monitoring or testing **required by Section D** performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63** or other approved methods as specified in this permit.

36. Condition C.13 (Temperature Gauge Specifications) has had rule cites added. Language has also been added for other instrument specifications as follows.

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

- (a) Whenever a condition in this permit requires the measurement of ~~a exhaust temperature across any part of the unit or its control device, the gauge employed~~ **the instrument employed** shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
- (b) **The Permittee may request the IDEM, OAM approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.**

37. Condition C.14 (Emergency Reduction Plans) There was an error in this condition. The ERP does require certification by the responsible official, since most of the time an emergency will mean shut down.

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does ~~not~~ require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

38. Condition C.15 (Risk Management Plan) (b) was removed because it is repetitive of (a)(2) (now (b)). They both required the same thing, and the source does not need to separately certify RMP compliance as follows:

The first paragraph of this condition has been revised to more closely match the rule language as follows:

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in ~~a process at a source~~ in more than ~~the a~~ threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall **submit**:

~~(a) — Submit:~~

~~(1)(a)~~ A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a); or~~

~~(2)(b)~~ As a part of the **annual** compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

~~(3)(c)~~ A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

~~(b) — Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.~~

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

39. Condition C.16 (Compliance Monitoring Plan - Failure to Take Response Steps) (c)(1) has been revised to clarify the intent. 326 IAC 1-6 has been removed because it is not correct since this condition has no reference to PMPs as follows:

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. **The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the** This compliance monitoring plan is comprised of are:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;

- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
  - (A) **Reasonable** response steps that ~~may~~ **will** be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking **reasonable** ~~such~~ response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, ~~appropriate~~ **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan **to take reasonable response steps may** ~~shall~~ constitute a violation of the permit. ~~unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- (c) ~~After investigating the reason for the excursion,~~ **Upon investigation of a compliance monitoring excursion,** the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) ~~The monitoring equipment malfunctioned, giving a false reading.~~ **A false reading occurs due to the malfunction of the monitoring equipment.** This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied ~~or~~;
  - (3) An automatic measurement was taken when the process was not operating; ~~or~~
  - (4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) **All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.**

- (f) ~~If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.~~
- (4) At its discretion, IDEM may excuse **the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides such failure providing adequate justification is documented and documents that** such failures do not exceed five percent (5%) of the operating time in any quarter.
- (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.
40. Condition C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test) has been revised as follows:

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate **corrective response** actions. The Permittee shall submit a description of these **corrective response** actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize **excess** emissions from the affected facility while the **corrective response** actions are being implemented. ~~IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~
- (c) **IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.**

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

41. Condition C.18 (Emission Statement) language was added to clarify that emission statements should be certified by the responsible official and that regulated pollutants are defined in 326 IAC 2-7-1.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate **estimated** actual emissions of other regulated pollutants (**as defined by 326 IAC 2-7-1**) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

**The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
42. Condition C.19 (Monitoring Data Availability) has been incorporated into C.16 Compliance Monitoring Plan- Failure to Take Response Steps. The rest of Section C has been re-numbered to account for the deletion of C.19.

~~C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]~~

- ~~(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~
- ~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~
- ~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~
- ~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~
- ~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~
- ~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

43. Condition C.20 (now C.19) (General Record Keeping Requirements) the word “monitoring” was removed so that the condition will seem more generalized to all record keeping, the word “reports” was added to clarify that the source must keep copies of those as well. Paragraphs (b) and (c) have been removed because they were unnecessary.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required ~~monitoring data~~ **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request of an IDEM, OAM, representative.~~ The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) ~~Records of required monitoring information shall include, where applicable:~~
  - (1) ~~The date, place, and time of sampling or measurements;~~
  - (2) ~~The dates analyses were performed;~~
  - (3) ~~The company or entity performing the analyses;~~
  - (4) ~~The analytic techniques or methods used;~~
  - (5) ~~The results of such analyses; and~~
  - (6) ~~The operating conditions existing at the time of sampling or measurement.~~
- (c) ~~Support information shall include, where applicable:~~
  - (1) ~~Copies of all reports required by this permit;~~
  - (2) ~~All original strip chart recordings for continuous monitoring instrumentation;~~
  - (3) ~~All calibration and maintenance records; shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section G - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

44. Condition C.21 (now C.20) (General Reporting Requirements) has been changed as follows to clarify exactly which documents require certification by the responsible official. Condition C.21 (now C.20) (General Reporting Requirements) (d) has been revised so that it is clear the reports it refers to are the ones required by Section D. Condition C.21(g) has been revised to clarify that IDEM base quarters and semi-annual reports on calendar year not on when the permit is issued. For example if a source is issued a permit in February, they need to submit their first quarterly report in March. Condition C.21 (now C.20) (General Reporting Requirements) has changed the Semi-Annual Compliance Monitoring Report to the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report has been deleted. All the information is in Condition B.13. In paragraph (d) IDEM has clarified that the report does need to be certified by the responsible official. This change is also reflected in all the D sections and the reporting forms. EPA has also requested this change.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit **a the attached Quarterly Semi-Annual Deviation and Compliance Monitoring Report or its equivalent**. Any deviation from the **permit** requirements, ~~and~~, the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any **quarterly or semi-annual report required in Section D of this permit** shall be submitted within thirty (30) days of the end of the reporting period. **The reports do-require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(e) All instances of deviations as described in Section B-Deviations from Permit Requirements Conditions must be clearly identified in such reports.~~
- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- ~~(g)~~**(e)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

~~The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

45. Condition D.1.5 and similarly Conditions D.2.2, D.3.4, D.4.7 and D.5.4 have all been deleted as follows:

**Compliance Determination Requirements**

~~D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the temperature requirement specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C-Performance Testing.~~

46. The choice of affidavit has been added to the Certification form as follows:

47. A statement has been added to the Natural Gas Fired Boiler Certification stating that these forms do not require a certification. The bottom of each of these forms now say "A certification is not required for this report".
48. Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the Compliance Branch, not the Compliance Data Section. IDEM has negotiated with EPA on the reporting of emergencies. They agree to allow the 2 day notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official, therefore will comply with the Part 70 requirement to have all reports certified.
49. The monthly and quarterly reports will now need to be certified by the responsible official, therefore the last line in each of these reports have been changed from ~~"A certification is not required for this report."~~ to **"Attach a signed certification to complete this report"**.
50. The Quarterly or Semi-Annual Compliance Monitoring Report, is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. IDEM is no longer requiring sources to report deviations in ten days, therefore every source will need submit this report quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Reclaimed Energy Company, Inc.  
Source Address: 1500 Western Avenue, Connersville, Indiana 47331  
Mailing Address: 1500 Western Avenue, Connersville, Indiana 47331  
Part 70 Permit No.: T 041-6719-00015

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION **BRANCH**  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967

PART 70 OPERATING PERMIT  
EMERGENCY/~~DEVIATION~~ **OCCURRENCE** REPORT

Source Name: Reclaimed Energy Company, Inc.  
Source Address: 1500 Western Avenue, Connersville, Indiana 47331  
Mailing Address: 1500 Western Avenue, Connersville, Indiana 47331  
Part 70 Permit No.: T 041-6719-00015

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No. 2	
9 1. —	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing by mail or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. —	This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/ <del>Deviation</del> :
Describe the cause of the Emergency/ <del>Deviation</del> :

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/ <del>Deviation</del> started:
Date/Time Emergency/ <del>Deviation</del> was corrected:
Was the facility being properly operated at the time of the emergency/ <del>deviation</del> ?      Y      N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/ <del>deviation</del> :
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT  
**QUARTERLY SEMI-ANNUAL DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: Reclaimed Energy Company, Inc.  
Source Address: 1500 Western Avenue, Connersville, Indiana 47331  
Mailing Address: 1500 Western Avenue, Connersville, Indiana 47331  
Part 70 Permit No.: T 041-6719-00015

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted <b>quarterly semi-annually</b> based on a calendar year. Any deviation from the compliance monitoring requirements, and the date(s) of each deviation, <b>the probable cause of the deviation, and the response steps taken</b> must be reported. with the following exceptions: <b>Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.</b> Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #)</p>	
<p>Date of each Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #)</p>	
<p>Date of each Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #)	
<b>Date of each Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #)	
<b>Date of each Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #)	
<b>Date of each Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT  
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Reclaimed Energy Company, Inc.  
Source Address: 1500 Western Avenue, Connersville, Indiana 47331  
Mailing Address: 1500 Western Avenue, Connersville, Indiana 47331  
Part 70 Permit No.: T 041-6719-00015

This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel  
From To

~~(can omit boiler affected if only one gas boiler at this plant)~~

I certify that, based on information and belief formed after reasonable inquiry, the statements and  
information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34)  
is not required for this report.